Guildford borough Submission
Local Plan: strategy and sites

Regulation 19 consultation representations
(ordered by respondent ID number)

December 2017

Document 4 of 10
Respondent ID numbers 10860065 to 10999873
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### Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

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<th>Comment ID: pslp172/2385</th>
<th>Respondent: 10860065 / Jenna Wright</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
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<td>I would like to officially log that I object to Policy A26 and the inclusion of Blackwell Farm and surrounding green belt land as a development site [Policy A26 &amp; para. 4.1.9]</td>
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<td>1) Disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]. This has been ignored by the council and the local plan.</td>
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<td>2) Directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&amp;E – and will also encourage rat-running through residential areas. This additional office space is not required and will add additional unnecessary burden on local housing needs.</td>
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<td>3) Ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]. Traffic is already a major problem in Guilford and this development will make travel down the A3 and Hogs Back and surrounding areas unbearable.</td>
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<td>4) Adds to air pollution in neighbouring areas, which already exceeds safe EU limits for nitrogen oxides [Policy A26].</td>
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<td>I object to Sendhill Development, the road is not wide enough for cars also cemetary parking. We are Green Belt also. Send Road, Send marsh are congested now extra cars will be mayhem. As for the travellers site, nothing will be safe. I have lived in send for 54 years. It will no longer be a villiage.</td>
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I am writing to object to the local plan for the Horsleys. My objections are as follows;

485 additional dwellings-How many extra residents will this mean? Another 1,500?

Added to the proposed development of Wisley airfield of another 2100 dwellings and around 8000? It appears this plan is to cram as many people as possible into this area, whilst destroying much of the environment.

If the Horsleys are taken out of the Green Belt, I feel it will lead to extra development in the future. Finally, the present infrastructure will not support this plan. The Medical Centre will be under severe pressure. The schools will be full to overflowing (as they are already). No shops in West Horsley (remaining shop due to close next month) leading to extra pressure on East Horsleys parking for shops and station. The roads. Which are for the most part country lanes, will be horrendous, with traffic. The drainage system will be unable to cope. There will be tremendous impact on the wild life. I do not object to a reasonable number of new affordable homes in the Horsleys, as I realise there is a need for them, but this local plan does not take into account the cost to the environment, or to the taxpayers.

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

Attached documents:
Having attended my local meetings to review the updated plans for the expansion of the available housing stock in the Horsleys I have some serious reservations.

The housing density per allocated plot in no way reflects the current density per area in West Horsley. How can this be considered a balanced approach? If using the formula for housing expansion that would normally be applied to a town means that the intention is really to turn the Horsleys into a small town then please come clean about the intended outcome.

Some of us that have left towns to find the joys of living in a village community will have to accept the fact we are being driven out to find ourselves another village to live in until the dreaded developers arrive on our doorsteps again in the future.

Mentioning the greenbelt seems of little point either.

Throwing the "lungs of London" away doesn't seem of any concern to anyone with their greedy hands in the housing money pot. Schooling and Doctors places will need expansion. This is very "undefined" as a strategy at present. As for the removal of all of the extra human waste, both bodily and refuse, this seems to be far off in the distance with all of the focus just on "Build, Build, Build". Has anyone done a risk analysis, forecast projection, or even a plan???

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

Attached documents:
Thatchers Hotel and Horsley Towers:

I am disappointed to see this development proposal. There are very limited places to walk for Drinks and Casual Meals and this will remove a necessary scenic retreat leaving only one Pub.

Heavy Rain last year demonstrated drainage and flooding problems along roads slanting down into the Village. Further remedial action is needed before exacerbating the problem with this elevated site development.

I see no reference to Travellers Pitches in the Village so understand that this original proposal has been withdrawn as not in character with the Village (previous reference to former BT site).

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

Attached documents:

Wisley Airfield:

This large housing development will clearly overwhelm parking at Horsley and Effingham Rail Stations and Village Car Park, swamp narrow local roads and lanes, cause blockages, rat runs and potential accidents.

I am concerned that it will cut off current footbridge access over the A3 to Wisley RHS.

Effingham Junction needs to expand Parking and have Wisley residents directed to join there instead of Horsley, by Bus or otherwise.

I think the Train Service is not sufficiently frequent with enough Coaches to accommodate the large influx proposed. Overcrowding would arise long before other Surrey Stations board towards London. The service into Guildford is less busy than into London (except on evening commuter return from London at Waterloo).

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

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> I am concerned that it will cut off current footbridge access over the A3 to Wisley RHS.

> Effingham Junction needs to expand Parking and have Wisley residents directed to join there instead of Horsley, by Bus or otherwise.

> I think the Train Service is not sufficiently frequent with enough Coaches to accommodate the large influx proposed. Overcrowding would arise long before other Surrey Stations board towards London. The service into Guildford is less busy than into London (except on evening commuter return from London at Waterloo).

> 4) It is not clear what design of infill housing is proposed. East Horsley has uniquely varied quality housing, and standard block builds would detract from this.

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

Attached documents:

Comment ID: PSLPS16/7089  Respondent: 10860801 / Andrew Gavan  Agent:

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

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

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

1) Thatchers Hotel and Horsley Towers:

> I am disappointed to see this development proposal. There are very limited places to walk for Drinks and Casual Meals and this will remove a necessary scenic retreat leaving only one Pub.

> Heavy Rain last year demonstrated drainage and flooding problems along roads slanting down into the Village. Further remedial action is needed before exacerbating the problem with this elevated site development.

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

Attached documents:

Comment ID: PSLPP16/11157  Respondent: 10860801 / Andrew Gavan  Agent:
**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4**

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

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

It is not clear what design of infill housing is proposed. East Horsley has uniquely varied quality housing, and standard block builds would detract from this.

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

Attached documents:

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**Comment ID:** PSLPP16/15910  **Respondent:** 10860801 / Andrew Gavan  **Agent:**

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**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2**

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

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

2) I see no reference to Travellers Pitches in the Village so understand that this original proposal has been withdrawn as not in character with the Village (previous reference to former BT site).

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

Attached documents:

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**Comment ID:** PSLPA16/971  **Respondent:** 10860865 / John Wright  **Agent:**

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

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

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

The Strategic Housing Market Assessment {SHMA) gives a housing need of 693 houses per year {four years ago the figure was around half that). In contrast a report commissioned by Guildford Residents’ Association {GRA) assesses 510 homes needed per year. GBC figures calculations have been withheld from any disclosure . Query on the soundness of figures.

The overall assessment of housing needs in Guildford Borough during the Plan period is some 13,860 houses (Policy S2) with a very large part of that proposed to be in the north sector of the Borough. Query on the higher impact on 'selected' areas of the Borough.
The proposals seem to be whittling away any gaps that currently exist between the recognised parts of the Borough and the outlying villages including current 'Green Belt' land without giving justifiable or exceptional reasons for using 'Green Belt' land as opposed to 'Brownfield' land in the Town Centre or periphery. Query on using 'Green Belt' rather than 'Brownfield' land for developments.

GBC is proposing significantly higher housing needs than are the neighbouring Boroughs of Waverley or Woking without any explanation or justification. Query on why Guildford should take the higher share of developments in the area?

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

Attached documents:

Comment ID: PSLPP16/3241  Respondent: 10860865 / John Wright  Agent:

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

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

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

The Document was made available, without much real publicity, to 'The General Public' who are only allowed an extremely short time to look at the Document; digest the contents; try to understand the contents; compile a list of comments; prepare that list into a letter or email; send such letter or email to GBC before the final date for receipt of any objections.

The Document is presented in a very user unfriendly manner - people cannot readily find what sections are applicable to them; there are often several sections with seemingly unmatched information; very little proper cross referencing; it seems to be presented in a manner with the prime intention of bamboozling any member of 'The General Public' who dares to look at it.

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

Attached documents:

Comment ID: PSLPA16/1678  Respondent: 10860993 / Peter and Fiona Armitage  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
In general terms I have grave concerns over the sheer scale of the proposed building development which is substantially in excess of all accepted population growth estimates for the Borough. Why so many when you have failed to demonstrate that they are required on this scale? I object to the plan on these grounds alone.

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

Attached documents:

Comment ID: PSLPA16/3848  Respondent: 10860993 / Peter and Fiona Armitage  Agent:

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

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

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

I object to the proposed number of houses suggested for East Horsley. It seems that you are trying to turn a small rural village into a town. There appears to be no consideration for the infrastructure required. Horsley is already at saturation point with regard to its local school, medical centre and roads.

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

Attached documents:

Comment ID: PSLPA16/1679  Respondent: 10860993 / Peter and Fiona Armitage  Agent:

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

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

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

In more specific terms I object strongly to the proposed development of 533 houses on six sites in the Horsleys. East Horsley is an attractive independent rural village and not an extended suburb of the South West area of London. It must remain that way. As before, you are very light on the increased infrastructure that will be needed to accommodate

1) an additional 700 cars on narrow poorly maintained roads, some without pavements
2) an additional 150+ children in local primary schools that are absolutely full already
3) an additional 3000 people for medical care when the local Medical Centre is full already.

Where is the thought through strategy taking into account the interests of the existing residents of the area who you are meant to represent?
You also ignore the adjacent East Horsley Conservation Area when you propose the development at Thatchers Hotel. I object to this and the other development proposals in the Horsleys.

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

Attached documents:

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Comment ID: PSLPS16/3228  Respondent: 10860993 / Peter and Fiona Armitage  Agent:

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

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

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

I also object strongly to the proposals to build 2000 houses on the former Wisley Airfield as this is part of an existing designated green belt area.

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

Attached documents:

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Comment ID: PSLPS16/7206  Respondent: 10860993 / Peter and Fiona Armitage  Agent:

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

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

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

I object to the development of Wisley Airfield. The application to build on this site is totally excessive. Again there is no infrastructure to support this development. The village of Ockham would be destroyed.

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

Attached documents:

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Comment ID: PSLPP16/7093  Respondent: 10860993 / Peter and Fiona Armitage  Agent:

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

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The Surrey Hills are an Area of Outstanding Natural Beauty and you state clearly that you will continue to protect the Metropolitan Green Belt and yet the majority of this excessive development proposed is on green belt. How can you possibly reconcile these two conflicting issues? There is a certain lack of honesty here. I object to the plan on these grounds as well.

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

Attached documents:

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

I object to the plan to build houses in the green belt. How can you state that you will protect the green belt when you are proposing to build so many houses in the green belt.

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

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

You received a substantial level of objections to your previous proposed plan in 2014 and yet this relaunch is fundamentally broadly similar to your previous plan suggesting that little has been learnt from the previous exercise or that GBC is not really listening to the expressed views and wishes of its rates paying residents.

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

Attached documents:
In conclusion I know residents are frustrated by having to write in objection on more than one occasion in response to "new" proposals that are not very different to the previous proposals - a sure sign that GBC is either failing to learn from residents or even worse not really listening to their views.

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

Attached documents:
The village's are at full capacity at the moment and the original Infrastructure road's car park,s drainage school,s and medical facilities will not be able to cope with proposed expansion.

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

Attached documents:

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Comment ID: PSLPP16/13527  Respondent: 10861089 / Philip Homewood  Agent:

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

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

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

I strongly object to the GBC local plan on the following point,s There is no good reason to remove the Horsley,s from the Green Belt.
No Green Belt land should be released for development around the Horsley,s or Ockham Wisley Airfield as to do this would lead to a breakdown of this rural area of Surrey in the future.

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

Attached documents:

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Comment ID: pslp172/2401  Respondent: 10861217 / Lesley Mantell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

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

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

policy A42.. My home overlooks the proposed site in Tannery lane and I object strongly to 60 new homes up from 45.
The infastructure ( sewage, schools, doctors ) will not take the additional homes, this is absolute madness and you have totally disregarded any comments I have made.
We already flood in some parts of the village and additional building will make it worse.

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

Attached documents:

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Comment ID: pslp172/2448  Respondent: 10861217 / Lesley Mantell  Agent:
I object to Policy A42

Because the original plan of 45 homes in itself is far too many but to now increase to 60 is far beyond the village and the the road and traffic problems it will create to even contemplate.

I fear for the safety of the local children and the hundreds more that will be joining them. The area can be prone to flooding.

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

Attached documents:

I am Objecting because 400 homes and 6 travellers sites is complete overkill and will join Send Marsh and Ripley together.

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

Attached documents:

I object to Policy A43

I object to Policy A58

I object to Policy A62
Policy A58 will add to Send’s woes by more heavy vehicles blocking and damaging the roads and making it mire unsafe for our children and more importantly their health.

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

Attached documents:

Comment ID: pslp172/2447  Respondent: 10861217 / Lesley Mantell  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

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

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

I object to Policy A58

Because there are sites that are empty at Slyfield and Guildford. I cannot believe that suggestions to use green belt land when brown field sites are up and running.

The amount of heavy traffic using Send as a cut through to and from Woking is diabolical and to add to this nightmare would be a disgrace.

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

Attached documents:

Comment ID: pslp171/800  Respondent: 10861217 / Lesley Mantell  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

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

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

Policy 2 at paragraph 4.3.17 Green Belt. I object also to inset Send Business Park from the green belt because Tannery lane is narrow and completely unsuitable for lorry access with many near missed collisions with cars, lorries and cyclists for gods sake this is a small village, what is it going to take someone to die !!

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

Attached documents:

Comment ID: pslp171/856  Respondent: 10861217 / Lesley Mantell  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
I object to Policy 2 at paragraph 4.3.15

Because in conjunction with the above policy Tannery Lane and the junction on to Send Rd will become a major accident zone. the lane is far to narrow for large vehicles and the added pressure of more vehicles from the the planned 60 homes on the nursery site at that junction will I feel eventually end with a fatality at some point.

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

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

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

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

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- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
We do not have the Transport infrastructure to accommodate 1800 extra houses on the Blackwell Farm site. At peak times the area around the University/Hospital/A3 is totally congested and the A31 is often gridlocked for miles towards Farnham. As people try to access other routes towards this area, the main road through Wood Street Village can get totally congested. I strongly object to the development at Blackwell Farm taking place.

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

Attached documents:

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Comment ID: PSLPS16/2508  
**Respondent:** 10861441 / Peter Read  
**Agent:**

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

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

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

I feel that more investigation in finding small scale developments in this village and others in the surrounding area us the use of brown field sites would make unnecessary such a large scale development with all its attendant damage to the rural life and its residents.

* I am led to believe by Surrey Council Traffic simulations, that the roads serving this village are judged to be above their designed capacity.

  Dangerous junctions at Glaziers tt Westwood Lanes with Aldershot Road A323

  Steep, winding road from Wanborough Hill to junct on with Aldershot road which also has a very narrow one-vehicle bridge

  init. This road and others are used heavily during peak times and during A3 tt A31 closures.

  Hump bridge in Glaziers Lane with dangerous blind station entrance.

  90 degree sharp bend at Glaziers Lane and Flexford Lane junction. These are minor lanes, tree-lined in many places with inconsistent footpaths.

  The station has only a half hour service, a very small car parking area, is unmanned and has no disabled access to Guildford trains. The station car parking is already causing long term parkingin the residential roads nearby.

  Medical centre is inadequate for proposed development

If the proposed plan were to be carried out, all or most of these infrastructure points would have to be addressed at considerable cost and upheaval. Even then the character and lfe of the village would be destroyed making it for all intents and purposes a small town.
• I had been assured that the Green Belt status of this site was safe guarded and no Exceptional Circumstance had been

• With more selective planning a school of the proposed size would not be needed here.
• I fear this plan will do permanent damage to the wildlife and green areas that surround us.

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

Attached documents:

Comment ID: pslp172/3355  Respondent: 10861441 / Peter Read  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

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

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

I SUPPORT the removal of site A46 - 1,100 homes and school.

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

Attached documents:

Comment ID: pslp172/3356  Respondent: 10861441 / Peter Read  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A47

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

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

I SUPPORT the removal of the site A47 - 50 Homes

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

Attached documents:

Comment ID: pslp171/1623  Respondent: 10861441 / Peter Read  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
I OBJECT to the removal from the Green Belt of homes in Guildford Road, northern end of Glaziers Lane, Flexford, Walden Cottages & Palm House Nurseries traveller site.

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

Attached documents:

Comment ID: PSLPS16/1854  Respondent: 10861569 / Christine Read  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

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

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

Response to the Guildford Borough Council Local Plan for Development in Normandy Parish.

I OBJECT to the proposed 146 plan on the following basis.

* the plan is on such a huge scale that it is insensitive to the needs and requirements of this rural area and its residents. Although it is appreciated that more housing is required this plan will totally destroy our neighbourhood.

*insufficient investigation in providing smaller scale developments in this and all other surrounding developed areas and brown field sites.

*the road infrastructure of this area is already stressed at peak times and in its present form it could not support any increase. The level of traffic on our roads has I understand, been judged as above the capacity for which they were designed (see Surrey County traffic simulations).

Dangerous hump bridge and bend in Glaziers Lane

Single Vehicle arch bridge in Westwood Lane

Both of these are minor country lanes not major roads.

Dangerous entrance to station.

Insufficient station car parking

Station inadequate - no disabled access to Guildford platform.

Infrequent train service

Insufficient footpaths on both Glaziers and Westwood Lanes
Difficult exit to and from both Glaziers & Westwood Lanes to Aldershot Road (A323).

Medical centre too small for proposed development

Winding access road from Wanborough Hill which is heavily used as an escape route from A31 & A3 during peak periods and road closures.

ALL the above points need to be improved or rectified prior to building the proposed development. It is understood that no funding has been confirmed for this work.

*large scale building on the existing Green Belt is unacceptable and no 'Exceptional Circumstances' have been demonstrated. It is only the plan to build this huge development that makes a new school necessary in this area. It could be sited where there is an existing requirement and suitable infrastructure.

*Insufficient care, planning and consideration for the protection of wildlife and the unique special green spaces in this area.

*confusing applications to various committees resulting in inadequate consultation of residents.

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

Attached documents:

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Comment ID: PSLPS16/4123  Respondent: 10861569 / Christine Read  Agent:

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

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

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

I OBJECT TO THE PROPOSED A46 PLAN ON THE FOLLOWING BASIS.

The plan is on such a huge scale that it is insensitive to the needs and requirements of this rural area and its residents. Although it is appreciated that more housing is required this plan will totally destroy our neighbourhood.

Insufficient investigation in providing smaller scale developments in this and all other surrounding developed areas and brown field

The road infrastructure of this area is already stressed at peak times and in its present form it could not support any The level of traffic on our roads has I understand, been judged as above the capacity fr which they were designed (see Surrey Council traffic simulations)

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Both of these are minor country lanes not major roads. Dangerous entrance to station.
Insufficient station car parking

Station inadequate - no disabled access to Guildford platform. Infrequent train service

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Medical centre too small for proposed development

Winding access road from Wanborough Hill which is heavily used as an escape route from A31 & A3 during peak periods and road closures.

ALL the above points need to be improved or rectified prior to building the proposed development. It is understood that no funding has been confirmed for this work.

Large scale building on the existing Green Belt is unacceptable and no 'Exceptional Circumstances' have been

It is only the plan to build this huge development that makes a new school necessary in this area. It could be sited where there is an existing requirement and suitable infrastructure.

Insufficient care, planning and consideration for the protection of wildlife and the unique special green spaces in this

Confusing applications to various committees resulting in inadequate consultation of residents.

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

Attached documents:

Comment ID: pslp172/4896  Respondent: 10861569 / Christine Read  Agent:

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

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

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

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

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

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

Attached documents:
Comment ID: pslp172/3342  Respondent: 10861569 / Christine Read  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

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

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

I fully SUPPORT the removal of site A46 from the Local Plan.

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

Attached documents:

Comment ID: pslp172/3344  Respondent: 10861569 / Christine Read  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A47

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

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

I SUPPORT the proposal to remove this site from the Local Plan as it is on Green Belt land and also the village infrastructure cannot support such high density developments.

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

Attached documents:

Comment ID: pslp171/1618  Respondent: 10861569 / Christine Read  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

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

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

Removal from the Green Belt of homes in Guildford Road, northern end of Glaziers Lane, Flexford, Walden Cottage & Palm House Nurseries traveller site.

I OBJECT to this proposal as removing the Green Belt protection as these sites contribute to the openness of the Green Belt.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID:</th>
<th>pslp172/2002</th>
<th>Respondent:</th>
<th>10861633 / Rosemary Lee</th>
<th>Agent:</th>
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- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

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

Attached documents:

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<th>Comment ID:</th>
<th>PSLPP16/15657</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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Even if the huge number of houses to be built can be justified, the local community will not benefit. There is no clear requirement for affordable housing - GBC apply an 80% of market value rule to define affordable, which is obviously laughable, while the Local Plan seems to suggest that any developer can simply choose not to build affordable housing.

This means houses are built for investment by wealthy individuals and businesses, failing to deliver any community benefits.

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

Comment ID: PSLPP16/15656  Respondent: 10862977 / Neil Langridge  Agent:

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

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

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

The building of thousands of homes on Green Belt is further destruction of the claim that the plan "protects our most important countryside, landscapes and heritage". The NPPF requires that any development on Green Belt has support of local residents, but GBC are utterly incapable of proving that.

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

Attached documents:

Comment ID: PSLPP16/15655  Respondent: 10862977 / Neil Langridge  Agent:

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

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

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

I wish to register my objection to the Guildford Local Plan. While there are positive elements, it includes a number of fundamental flaws to the strategy and implementation of the plan that makes it completely unsound and not fit for purpose. Should it be implemented in its current form, it would constitute a complete dereliction of the duty of Guildford Borough Council (GBC) to the community.

GBC are unable to demonstrate that the Local Plan has any significant popular support. The previous, failed and rejected effort attracted many more complaints than supporting messages, and GBC have made minimal attempt at community engagement. Basic publicity and events have kept it low profile, meaning many people have either not heard of it or don't know much about it. While GBC may claim otherwise, any cursory view on the communications strategy is damning and seems to show a clear attempt to minimise any potential feedback. The fact the documentation is so long, written in complex language and hard to read formatting adds to the difficult in responding.

Further, the plan documentation and process has built on that approach. Incredibly long documents, poor formatting, hard to read font and a difficult response process has been designed it to make it hard to provide constructive feedback. GBC have an established process for ensuring that it is easy to reject negative feedback on planning matters, and the Local Plan is a clear continuation of that.
The stunning lack of strategic planning is painful. At its most basic, any plan of this scale must include essential infrastructure improvements. And yet GBC plan to allow the start of building of thousands of houses at Gosden Hill before the planning for the proposed A3 tunnel...which would start at the same place. With no upgrade in roads (or clearly impossible developments, such as Sustainable Movement Corridor through Burpham), the tunnel becomes essential for the future of Guildford, and to avoid Burpham becoming a car park. Yet the plan hopes to start building, before a decision has been reached on the tunnel. In any commercial enterprise, such a staggering lack of forethought would result in instant rejection. The same criteria should be applied here.

The previous Draft Local Plan was delayed and re-written, yet nothing has changed sufficiently to change that decision.

A number of other local bodies, including the Burpham Community Association, Burpham Neighbourhood Forum and Guildford Residents Association will all submit their objections with significant technical details and research that condemns the plans, so I will not duplicate those efforts.

However, the plan is so transparently flawed in serious ways that are fundamental, meaning it should be rejected.

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

Attached documents:

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<th>Comment ID: PSLPA16/150</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I OBJECT TO the lack of any provision for new schools to accommodate the influx of people</td>
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<td>I OBJECT TO the lack of provision for doctor’s surgeries and all main services.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
I OBJECT TO the lack of consideration to the amount of traffic this will create – Ripley already has more than it can cope with being grid locked at rush hours already.

I OBJECT TO the amount of pollution the concentration of traffic in a small area will create.

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

Attached documents:
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<th>Comment ID: PSLPP16/11831</th>
<th>Respondent: 10863969 / Joanne Rooke</th>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<tr>
<td><strong>Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity</strong></td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.</strong></td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<td><strong>I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)</strong></td>
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<tr>
<td><strong>This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic</strong></td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools?</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

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

Attached documents:

Comment ID: PSLPP16/11820  Respondent: 10863969 / Joanne Rooke  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

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

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

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

Attached documents:

Comment ID: PSLPP16/11823  Respondent: 10863969 / Joanne Rooke  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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

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

I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

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

Attached documents:

Comment ID: PSLPP16/11818  Respondent: 10863969 / Joanne Rooke  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

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

Attached documents:

Comment ID: PSLPP16/11825  Respondent: 10863969 / Joanne Rooke  Agent:

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

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

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

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable

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

Attached documents:

Comment ID: pslp172/668  Respondent: 10863969 / Joanne Rooke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

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

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

I am writing to strongly object to the proposed development at the Garlick's Arch site. I object for the following reasons:
- the proposed housing would be on Greenbelt Land
- the potential increase from 400 houses at site A43 Garlicks Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages.
- the inclusion of 6 Travelling Showpeople plots with associated storage facilities is entirely inappropriate in a rural environment within the Greenbelt and there is no identified need within the Local Plan documentation. The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan and so is out of scale with the proposed development.

- the potential for a substantial increase in industrial floorspace from 7000 sq m to an unspecified amount at the site A58 Burnt Common does not provide local residents with enough information for a full and proper consultation given the ambiguity and lack of detail within the document.

- the potential for a Waste Management Facility at site A58 Burnt Common as briefly mentioned in policy 4.4.23a does not allow for full and proper consultation.

- the increase in housing numbers from 45 to 60 at Site A42 in Tannery Lane will have a significant impact on the already highly congested local rural road network around and within Ripley.

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

**Attached documents:**
I hope these objections will be fully considered and in particular the former Wisley Airfield is removed from the Local Plan.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/6618</th>
<th>Respondent: 10864065 / Alec Mcindoe</th>
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I object to the proposed development of 2,000 homes at Gosden Hill Farm, which is currently in the Green Belt and in direct contravention of Central Government's commitment to the protection of the Green Belt.

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

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPS16/6619</th>
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I object to the proposed development of 2,000 homes at the Wisley Airfield site for the same reasons as above.

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

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPS16/6615</th>
<th>Respondent: 10864065 / Alec Mcindoe</th>
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I object to the proposed development at Garlick's Arch because an additional 400 plus homes together with the proposed industrial site would create huge repercussions to the local environment and community. The local roads are already overcrowded, particularly at peak time in the morning and evenings. Additionally, local health care and schooling is unable to accommodate an influx of people on this scale.

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

Attached documents:

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<th>Comment ID:</th>
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I object to the proposed new 4 way on/off ramp to A3 at Burnt Common. I am a regular user of the road through West Clandon and there is already a serious problem with heavy goods vehicles and buses/coaches using the road. The proposed new junctions would create even more commercial traffic accessing the A3. I am particularly concerned about the danger to children and parents delivering and collecting from Clandon School. At times, heavy vehicles can only proceed by mounting the pavement!

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

Attached documents:

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<th>Comment ID:</th>
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<th>10864065 / Alec Mcindoe</th>
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<td>Document:</td>
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</table>
I object to the proposed development of 40 houses and 2 travellers pitches at Send Hill because of the restricted access to the site and the consequential increase in traffic and dangers for pedestrians locally. I also understand that the subsoil of the proposed site contains documented unsafe landfill waste.

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

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPP16/13859</th>
<th>Respondent:</th>
<th>10864065 / Alec Mcindoe</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

I object to all removal of land from the Green Belt, particularly the removal of Send, Ripley, Wisley and Clandon.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPA16/352</th>
<th>Respondent:</th>
<th>10864193 / Roy Smithers</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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</table>

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

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

After reading through the Guildford Plan proposals my objections to this are based on the fact that without the protection of the existing green belt area, once the first section of land is built on there will be no protection left for the complete infill of the remaining area. This will turn Horley villages in to an urban zone with the resulting damage to both the natural environment and quality of life for the existing residents. The pressure from the increase in the local population will also have serious knock on effects on the nearby North Downs area which is classified as an area of outstanding natural beauty. One section of this AONB is the Sheepleas which is already suffering from an exponentially increasing number of visitors due to its proximity to the existing village. To turn this area in to what will be essentially a large town will cause huge pressure on the environment leading to a decline in quality of life for all people in the area including the newcomers and the destruction of its many rare and varied species of wildlife.

The effect on the existing roads and infrastructure has not been taken in to proper consideration. The roads in this area are in a disgraceful condition due to lack of investment both from local and national government. In years when there is little rain this area gets very short of water and suffers hosepipe bans and although some of the water is supplied from boreholes in the North Downs supplementing them with abstraction from the local rivers would be difficult without the risk of them drying up completely in drought conditions. This country still has a duty to take into full account all of these problems...
before rushing into a reckless decision to build houses in unsuitable areas such as Horsley and the surrounding villages. The local roads such as the A3 and A246 which are the main roads used by commuters to their places of employment, and schools for their children are already overloaded or become gridlocked in rush hour and this will only become much worse if these proposals go ahead.

Whilst it is acknowledged that the South East of England is a desirable place to reside due to its proximity to the Capital. It is unsustainable in the short term to even consider building huge numbers of houses in this area. Housing and jobs are required in other parts of the country which have high levels of poverty, social deprivation and unemployment. The South East in general is exhausting its supplies of natural resources such as the supply of sustainable drinking water due to over abstraction and adding to this problem would be very unadvisable. The local sewerage works are already close to capacity and the problems arising from untreated effluent entering the rivers during flood conditions would have a serious effect on the ecology of the local rivers and streams. This problem was serious on the river Wey catchment during the late 1970s when it became much polluted with raw untreated sewage. We will be destined to repeat this if we increase the number of houses to the levels proposed in this ill thought out plan. The local council need to reconsider the whole of these proposals as they could cause irreparable harm to the whole area which would be impossible to overcome once the damage is done. It is recognised by the majority of right thinking people that sometimes limited infill is necessary in order to provide a few houses for local residents to stay in the local area if they have family connections, but this proposal will destroy the whole fabric of the local community and destroy the villages in this area forever.

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

Attached documents:

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Comment ID: PSLPS16/2277  Respondent: 10864353 / Eildert Jan Panman  Agent:

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

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

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

I object to the inclusion of the old Wisley Airfield site in the draft local plan. This site has proved to be unsuitable for development on so many fronts that Councillors unanimously refused planning consent recently. Ifail to understand why it is still included in this new draft plan.

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

Attached documents:

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Comment ID: PSLPP16/5026  Respondent: 10864353 / Eildert Jan Panman  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Infrastructure Policy I1, I2 and 13 because they are inadequate to the needs of housing expansion in the Horsleys. The local lanes are narrow and winding, poorly drained and lit with narrow or no pavements. Ockham Road North and South is too narrow for the ever increasing number of enormous trucks using it and has the constraint of the narrow, arched railway bridge that regularly suffers vehicle strikes. The Medical Centre runs to capacity and so do local schools. The station car parks are full every day.

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

Attached documents:

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Policy P2 Para 4.3.13 proposes that East Horsley be inset from the Green Belt. I object to this. East Horsley is a rural village with narrow, winding, tree-lined lanes. Houses are mostly detached with large gardens. Its character has been preserved in the Green Belt without preventing new housing being built (149 new homes in the village between 2000 and 2015).

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

Attached documents:
Comment ID: PSLPP16/5022  Respondent: 10864353 / Eildert Jan Panman  Agent:

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

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

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

I object to the proposals in Policy P2 para 4.3.16 to change the settlement boundaries of East and West Horsley. I object to Policy A39 which proposes to remove five hectares of land from the Green Belt by moving the settlement boundary from its natural course along the deep ditch behind the houses on the west side of Ockham Road North to the eastern boundary of Lollesworth Wood.

I object to the settlement boundary being moved to take Kingston Meadows out of the Green Belt. This open space is the chief recreation space for the Horsleys, used daily for sports, walking, training and socialising and regularly for big community events like the recent Queen's Birthday Party. It is integral to the physical and social wellbeing of the area and must stay available to the community.

I object to Infrastructure Policy I2 and 13 because they are inadequate to the needs of housing expansion in the Horsleys. The local lanes are narrow and winding, poorly drained and lit with narrow or no pavements. Ockham Road North and South is too narrow for the ever increasing number of enormous trucks using it and has the constraint of the narrow, arched railway bridge that regularly suffers vehicle strikes. The Medical Centre runs to capacity and so do local schools. The station car parks are full every day.

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

Attached documents:

Comment ID: PSLPP16/5018  Respondent: 10864353 / Eildert Jan Panman  Agent:

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

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

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

I believe that the Draft Local Plan is built on an inaccurate assumption of the number of homes required. The SHMA has arrived at the number 693 without the methodology being made transparent. Recent work by Councillor David Reeve and another independent source has found serious fault with the SHMA which throws in doubt the whole draft local plan's calculations. I believe that GBC has gone along with the very large number because it is bent on its own aggressive policy of civic and economic expansion, which is not supported by the majority of the electorate. Therefore, I object to Policy S2.

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

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

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

I object to this draft local plan because the proposed number of homes is too big, predominantly on Green Belt land and not on the available brownfield sites, and Guildford Borough Council, despite saying they are listening to the electorate, have just rehashed the old local plan with even bigger housing numbers and greater destruction of the Green Belt.

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

Attached documents:

Comment ID: PSLPA16/19  Respondent: 10864481 / Claire Bright  Agent:

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

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

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

My objection is to any building in the village of Send due to the present population and lack of further facilities to cover more residents. I object to Send Hill being built upon due to the fact that the A247 is extremely busy several times a day, as is Potters Lane. Further traffic would have to come through Send from the A25, A3, Burpham, Wisley. Traffic outside the school will cause an accident. The doctors’ surgery will be unable to manage with more patients (bear in mind that the Ripley surgery was closed some years ago). Please register this as an objection.

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

Attached documents:

Comment ID: PSLPA16/21  Respondent: 10864481 / Claire Bright  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
This is an objection to building in the area of the village of Send. We are a village that has grown during the past 3 years to the state where traffic through the village can be unpleasant, the doctors’ surgery is more than busy and the A247 is regarded as a through road from the A3. Potters Lane is no longer a quiet lane due to the amount of traffic passing through taking a short cut from the A3. Tannery Lane is a small road and turning on to the A247 from there is dangerous.

Any further building (on land which I believe is protected) should not be permitted. Green belt land was called that for a reason and must not become brown belt. Send has grown to its capacity and must not be increased.

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

Attached documents:

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**Comment ID:** pslp172/1272  **Respondent:** 10864737 / Margaret Caressi  **Agent:**

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

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

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

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

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

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

Attached documents:

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**Comment ID:** pslp172/5096  **Respondent:** 10865089 / D Shotter  **Agent:**

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

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

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

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- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

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

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

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

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

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

**Attached documents:**

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Comment ID: PSLPS16/778  Respondent: 10865537 / Edwina Fassom  Agent:

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

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

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

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

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

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

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

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

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

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

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

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

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

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

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPS16/779  Respondent: 10865537 / Edwina Fassom  Agent:

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

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

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

1. I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).
The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brownfield site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

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

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

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPS16/780  Respondent: 10865537 / Edwina Fassom  Agent:

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

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

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

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

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

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

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

Attached documents:

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<th>Comment ID: PSLPP16/1604</th>
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<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

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

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

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

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

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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

1. **I OBJECT** to the sustainable employment policy (Policy E1)

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

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1602  
Respondent: 10865537 / Edwina Fassom  
Agent: 

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

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

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

1. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

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

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

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

Attached documents:

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Comment ID: PSLPP16/1603  
Respondent: 10865537 / Edwina Fassom  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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

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

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

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

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

1. POLICY E6 - The leisure and visitor experience

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

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

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

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

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

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

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

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<th>1.</th>
<th>I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions. The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated. I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London. Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.</th>
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**Comment ID:** PSLPP16/1609  **Respondent:** 10865537 / Edwina Fassom  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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

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

| 1. | POLICY H3 – Rural Exception Homes I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions. |
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances."

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

Attached documents:

Comment ID: PSLPP16/1605  Respondent: 10865537 / Edwina Fassom  Agent:

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

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

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

1. I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

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

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

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

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

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

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

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

1. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

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

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

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

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

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

Attached documents:

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Comment ID: PSLPP16/1606  **Respondent:** 10865537 / Edwina Fassom  **Agent:**

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

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

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

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

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

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

Attached documents:

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Comment ID: PSLPP16/1607  **Respondent:** 10865537 / Edwina Fassom  **Agent:**

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

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. I OBJECT to poor air quality concerns (Policy I3)

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

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

Attached documents:

Comment ID: PSLPP16/1599  Respondent: 10865537 / Edwina Fassom  Agent:

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

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

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

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not adress Garlick’s Arch, so there is no evidence base to support including this site.

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

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

Attached documents:

Comment ID: PSLPP16/1600  Respondent: 10865537 / Edwina Fassom  Agent:

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

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

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

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

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

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

Attached documents:

Comment ID: PSLPP16/1597  Respondent: 10865537 / Edwina Fassom  Agent: 

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

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

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

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

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

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

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

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

Attached documents:

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Comment ID: PSLPP16/1598  Respondent: 10865537 / Edwina Fassom  Agent:

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

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

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

1. I OBJECT to the Borough Wide Strategy (Policy S2)

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

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

c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared
with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

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

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

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1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green. Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

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

Attached documents:

Comment ID: pslp172/4672  Respondent: 10865537 / Edwina Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

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

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

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding...
is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

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

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

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

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

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

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

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

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved in order to improve capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site
will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

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

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

Attached documents:

Comment ID: pslp172/4673  Respondent: 10865537 / Edwina Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

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

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

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

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

Attached documents:

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Comment ID: pslp171/3114  Respondent: 10865537 / Edwina Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

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Comment ID: pslp17q/621  Respondent: 10865537 / Edwina Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

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

**Attached documents:**

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**Comment ID: PSLPA16/68  Respondent: 10865793 / Clare Smith  Agent:**

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

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

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

I strongly object to the above Plan. I live in the beautiful village of Ripley and have done for the past 12 years and I love it. This Plan will destroy the village and really affect my life.

I strongly object to the erosion of the green belt - I chose to live in Ripley because of the Green Belt it is in and the views and country life I enjoy.

I strongly object to the removal of Ripley from Green Belt.

I strongly object to the disproportionate amount of houses in one area of Guildford Borough - It’s a disgrace.

I strongly object to the very short consultation period especially as it’s during the Holiday period. The inclusion of new sites with less than 2 weeks notice is also a disgrace.

I have not seen any evidence for the alleged need for this incredible amount of houses you are proposing.

I strongly object to the lack of any new schools and there is a lack of spaces as it is - very ill thought through….

I strongly object to the lack of any new GP Practices - it’s hard enough as it is to get an appointment at the moment.

I hope you will consider my points objectively and hope that you will make a better informed decision and consider many factors along with quality of life and pollution and nature as well.

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

**Attached documents:**
1. I OBJECT to the proposal to build 45 houses at Clockbarn Nursery because of the potential traffic volume in a narrow twisty lane which is already subject to planning permission for 64 apartments at the Tannery and a Marina. The junction with the A247 is already dangerous and the lane cannot take more traffic.

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

Attached documents:

I OBJECT to the proposed building of 400 houses and 7000 square metres of industrial space at Garlick's Arch.

Guildford's housing requirements have been shown to be exaggerated as has the need for industrial space. The latter, if required, should be at Slyfield. The Garlick's Arch site is prone to flooding and includes ancient woodland. Development on such a large scale would be grossly disproportionate and local services and road networks would be unable to sustain it.

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

Attached documents:
1. I OBJECT to the development of 40 houses and two travellers, pitches at Send Hill, because I am concerned that the subsoil on that site contains documented unsafe landfill waste registered at GBC. This site (A44) was originally a sand pit not a quarry and was subsequently marked on Ordnance Survey map 1971 as a "refuse tip". I therefore fear that any disturbance would be a health hazard due to unknown infill materials and would also endanger the nearby nature reserve. There is also an identified risk of flooding to local properties of which mine is one.

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

Attached documents:

Comment ID: PSLPP16/4701  Respondent: 10865889 / Dreda M Todd DBO  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

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

1. I OBJECT to Send and Ripley villages being removed from the Green Belt. The National Planning Policy Framework required the Green Belt to be permanent. There are no special circumstances to justify abandoning it, in fact this reneges on the election promises of local and central government to protect the Green Belt. If Send and Ripley are removed from the Green Belt there will be nothing to stop Woking and Guildford becoming one sprawling conurbation, destroying for ever this beautiful and essential "lung" outside the M25.

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

Attached documents:

Comment ID: PSLPP16/4702  Respondent: 10865889 / Dreda M Todd DBO  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

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

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

6.1 OBJECT to the enormous and disproportionate volume of proposed development in this small area of Guildford Borough, which will impact negatively on local roads, services and air quality, reducing the quality of life considerably.

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

Attached documents:

Comment ID: SQLP16/837  Respondent: 10865889 / Dreda M Todd DBO  Agent:  

1. I OBJECT that GBC have not followed the correct procedure.

Since 2014 GBC has changed every major site in Send proposed for development. The 2014 proposal for 430 houses went down in April 2016 to 185 and has just gone up again to 485. These significant changes require another full consultation under Regulation 18, not the short cut of Regulation 19 which GBC are trying to get away with. This invalidates the whole process.

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

Attached documents:
environment. The alternative area also almost self-contained [ unlike around Normandy where there are no shops or anything! It is a truly rural area].

Also having examined your draft local plan for our area in Normandy and surroundings, the following points need to be addressed:

1- The intended expansion as advanced by your office in a green area such as Normandy and its surroundings will mean the removal of some of the green belt for Guildford and nearby towns and villages and it is neither legal nor acceptable;
2- The subject planning will increase the traffic loads on already congested roads, especially in peak times when to exist Glaziers lane can take up to 5 minutes due to the queues at the T junction with A323;
3- The roads in Normandy are already under strain and will not be able to cope with the new expected traffic load from so many houses;
4- The facilities in Normandy are already minimal for children so increasing the numbers means there will be no facilities available most of the time;
5- The surgery in Normandy is already being shared with another village and is at breaking point as it is not easy to get a doctor's appointment for a few weeks now so what will happen when all these houses are populated;
6- The school will also be unavailable to new children as there are very few places as it stands;
7- The air quality will deteriorate as a result of the increase traffic loads on the village roads;
8- In my opinion there are no exceptional circumstances which the Guildford planning office can use to infringe on the green belt;
9- Our Sewage and Electricity Services are already strained and we suffer from frequent electricity cuts so what will happen when the number of residents increases by such numbers!
10- Glaziers Lane presently is used by heavy goods vehicles and as a rat run to and from the A323 and the Hogs Back, damaging an already heavily used road. So what will happen when the number of cars and heavy vehicles increases as a result of the planned housing expansion?
11- Also please keep in mind, building so many houses on these green fields will subject our area and homes to flooding and we had some flooding last year!
12- The area has no post office, pub, petrol station, police outpost etc. How can you propose to increase the population without considering the effect on the locals who already pay very high local taxes.

Finally please remember this is a residential area with very limited resources to offer newcomers! Your plans will overstretch those few services already available to beyond breaking point.

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

Attached documents:
I am writing to object to the proposal under the local plan to remove the Horsleys from the green belt.

This would be totally unsuitable and a dangerous precedent. If it were to be agreed, I can foresee you or your successors in 10 years time being pressured to take further sites out of the green belt and then more still until eventually only a few pockets would be left. Future generations would be faced with the worst urban sprawl that the post-war planners had tried their utmost to prevent.

I also object to any proposal to build hundreds of new houses in east and (particularly) West Horsley. The problem is the infrastructure. The doctors surgery can take few, if any, new patients and the school have barely enough places for the existing children in the area. Any proposal for new houses running into hundreds must include new medical facilities and new or enlarged schools.

There is also the problem from heavier traffic on our narrow, often winding, and already hazard-strewn roads, which serve the villages. In addition, parking will become an increased problem with hundreds of new people in West Horsley coming into East Horsley for shops, station, etc. This will all make life far from ideal for the newcomers and lasting residents alike. Please do not allow developers to proceed with these proposals as they currently stand.

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

Attached documents:

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<tr>
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<th>Respondent: 10866305 / Christine Reeves</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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11) I Object to the lack of immediate provision for new schools

12) I Object to the lack of any immediate provision for Doctors Surgeries

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

Attached documents:

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<th>Comment ID: PSLPA16/430</th>
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10) I object to the lack of any immediate evidence for the alleged housing need numbers

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

Attached documents:

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Comment ID: PSLPS16/472  Respondent: 10866305 / Christine Reeves  Agent:

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

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

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

I object to site a43 Garlicks arch we don't need it. Surely as we are not part of Europe and we do not have to house Europe anymore it's not needed, when are we going to realise this small country of ours is full up, this development is just about money as they all are. Come on wake up.

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

Attached documents:

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Comment ID: PSLPS16/567  Respondent: 10866305 / Christine Reeves  Agent:

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

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

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

2) I object to site A43 Garlicks Arch

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

Attached documents:

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Comment ID: PSLPS16/568  Respondent: 10866305 / Christine Reeves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

3) I Object site A43a the on and off ramp at Clandon as this will increase traffic which is bad enough as it is, for the environment and local residents in the Villages already

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

Attached documents:

Comment ID: PSLPS16/569  Respondent: 10866305 / Christine Reeves  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

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

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

4) I Object to site A45 The Talbot - this is overdevelopment in a conservation area

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

Attached documents:

Comment ID: PSLPS16/570  Respondent: 10866305 / Christine Reeves  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

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

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

5) I Object to site A57 a The Paddocks - this is unlawful

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

Attached documents:

Comment ID: PSLPP16/1233  Respondent: 10866305 / Christine Reeves  Agent:
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>1) I Object to all erosion of the Green Belt</td>
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<td>6) I Object to any &quot;in-setting&quot; (I.e. Removal) of any villages from the Green Belt</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>7) I Object to the disproportionate amount of development in one area of the borough</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>8) I Object to the limited consultation period</td>
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<td>9) I Object to the last minute inclusion of new sites with less than 2 weeks notice</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<td>Attached documents:</td>
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</table>
We have lived in Normandy for 25 years and like the rural rambling nature of the village. We appreciate the rural atmosphere and the green spaces with close proximity to a wonderful town, Guildford. It is a thriving community with many social activities and clubs. Normandy is situated between Guildford, Farnham and Aldershot and building a significant number of houses in Normandy would mean that the 3 towns would begin to merge into one large metropolis (Guildhamshot?!). We did not move here to live in a new town with 1,100 new houses to be built. Surely brown sites should be considered first?

From the ridge of Ash ranges (SSI) looking South there is a fantastic view of the Hogs back (very famous landmark) with Guildford cathedral just visible to the South East. The view is primarily green, mainly trees and fields with very few houses visible. Building 1,100 house between Wyke and Christmas pie would destroy this view and have a detrimental effect on those who get pleasure walking/riding on the ranges.

We think that as a matter of principle, green belt should remain green belt. To us, having been told by councillors that our new policy is to protect the green belt, we have been led into thinking that Normandy is safe from development. However, we are now told that this no longer applies if a Secondary school is built. Where did the need for a Secondary school come from? From what I am told and presumably you can check this out, there is no need for a secondary school in Normandy as existing schools in the surrounding areas, such as Ash Manor, are not full. It seems to us that a Secondary school is only being proposed as a means of building houses - to us this does not seem right.

The traffic around Normandy has increased considerably since we have moved here and the number of traffic accidents seems to have risen significantly. Trying to get out of my drive (on the Pirbright Road) can be difficult at times (we sometimes even question whether traffic lights are appropriate for our drive). With the proposed new houses, the situation will only get worse and in my mind could lead to even more safety issues.

We hope you will not approve building 1,100 houses on Green Belt when there is no justification for it, especially when there are brown sites that are not being considered first.

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

Attached documents:
Re:- Guildford Local Plan 2016

Consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

"The borough of Guildford is a very special, beautiful place for all who live and work here. We want to keep it this way for generations to come."

This is your opening statement in the Local Plan 2016 and then you go on to describe your proposal to ruin one of the most special and beautiful places in the borough with proposals which will ensure the character and peace of the area irreversibly destroyed for ever.

With reference to the proposed plans to develop the Horsleys I wish to record my serious objections as follows:-

- The proposed developments are in established ‘Green Belt’ land. The status of ‘Green Belt’ is vitally important to the local communities, is jealously regarded by those who do not have it and should be retained at all costs for the sake of the future of the borough and the environment.
- The proposals pose a detrimental and irreversible threat to the quality of the district and local environment.
- The roads in the adjoining areas of Ripley, Ockham and the Horsleys struggle even now to cope with the demands placed upon them and are quite unsuitable to carry the considerable amount of additional traffic required to construct the developments and service them in use.
- The single track access to so some sites (e.g. site A40) is wholly unsatisfactory and the significant infrastructure changes all around the district required to facilitate the developments are not proposed with consequential damage to the local amenities, undesirable levels of noise, pollution and nuisance.
- Neither too is it proposed to enhance all the other infrastructures necessary to support a significant increase in the local population (e.g. public transport, shopping, schools, medical services and utilities).
- The extent of developments proposed (notably in the Horsleys and surrounding areas) is significantly and disproportionately higher than other areas in the borough; it is also planned for these to be at a very much higher level of density than the locality presently supports which will place an unsustainable burden on the local community.
- The proposals lie near an area of great beauty, and near sites of ‘Interest for Nature Conservation’ and a site of ‘Special Scientific Interest’
- The proposals will detrimentally and irreversibly affect the rural character of the local areas of Wisley, Ripley, Send, Ockham and the Horsleys.
- The damage to the amenity presently enjoyed by visitors and the local community for walking and rambling, cycling, horse riding and general enjoyment of the natural charm of the area will have an adverse effect on the economy of the area.

I trust these matters will be given the most serious consideration before these wholly unpalatable and undesirable proposals go any further and that they are recognised for the considerable social and environmental threat that they pose. I ask that they be rejected as totally unsatisfactory.

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

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

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

Both my wife and I object to policy A 42, A 43, policy A 58, and greenbelt policy paragraph 4.3.15 within the Send
borough as this will have a dramatic effect within the village

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

Attached documents:

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Comment ID:  PSLPP16/677  Respondent:  10866689 / P Brennan  Agent:

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

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

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

I wish to strongly object to the proposal to build residential properties at the Thatchers hotel site, the Ockham Road North
and South sites and Manor Farm /East Lane West Horsley. East and West Horsley are lovely small villages but with limited
infrastructure. Shops Schools medical facilities are already overwhelmed and the road network already sees long queues at
the village junctions with the Guildford/Epsom Road during the morning and evening rush hour. These proposals will
destroy the Horsleys and must be rejected. The recent referendum has shown how dissatisfied people are with the political
elite who have shown no understanding of the anger communities feel when they see their village/town taken away from
them by forcing population growth. Guildford should take heed and take measures to protect its lovely villages.

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

Attached documents:

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Comment ID:  PSLPA16/2626  Respondent:  10866721 / Andy Court  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
Lack of proper cycle lanes on local roads

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

Attached documents:

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Comment ID: PSLPA16/2627  Respondent: 10866721 / Andy Court  Agent:

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

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

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

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Current SHMA figure of 693 p.a. too high

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

Attached documents:

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Comment ID: PSLPP16/10915  Respondent: 10866721 / Andy Court  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

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

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

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Not meeting the needs of local communities

Poor quality of layout and housing design

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

Attached documents:

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Comment ID: PSLPP16/10912  Respondent: 10866721 / Andy Court  Agent:

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

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

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

Attached documents:

Comment ID: PSLPP16/10916  Respondent: 10866721 / Andy Court  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

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

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

Insufficient affordable housing

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

Attached documents:

Comment ID: PSLPP16/10905  Respondent: 10866721 / Andy Court  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

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

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

I object to the latest plan to remove our greenbelt for development. I was going to highlight all my concerns but after seeing the Ripley action groups website their specific points say it all.

I do not understand why councils/government do not look to build more towns well away from existing villages/towns as they did years ago with Milton Keynes. Building within existing villages totally over runs them and there are never amenities put in place to cope with schooling, doctors surgeries and traffic management. If there is an incident on either the A3 or the M25 it becomes totally gridlocked in Send Marsh/Send/Ripley as all the A3 traffic comes off and through Ripley.

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

Attached documents:

Comment ID: PSLPP16/10910  Respondent: 10866721 / Andy Court  Agent:

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

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

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

Lack of proper infrastructure planning for sites
I object to the lack of planning and implementation of infrastructure. For example at Garlick’s Arch. Without improvements to the infrastructure prior to development, the existing residents’ quality of life will significantly deteriorate in many ways. How will the local services such as doctors and schools cope?

Lack of Utilities Capacity
Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. I object to the development of Garlick’s Arch on the ground that there is little capacity in these networks.

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

Attached documents:

Comment ID: PSLPP16/10911  Respondent: 10866721 / Andy Court  Agent:

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

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

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

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

Local policing facilities will be overwhelmed
Police services are seeing funding reduced. The development of the likes of Garlick’s Arch and Wisley Airfield will stretch the police services further and I object.

Local social welfare facilities will be overwhelmed
Local shops/restaurant facilities will be overwhelmed

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

Attached documents:

Comment ID: PSLPP16/10917  Respondent: 10866721 / Andy Court  Agent:

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

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

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

Lack of proper pedestrian footpaths on local roads

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

Attached documents:

Comment ID: PSLPP16/10908  Respondent: 10866721 / Andy Court  Agent:

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

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

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

Congestion on the trunk roads, A3/M25
I object to the development of the strategic sites due to A3 and M25 already being at capacity during peak hours. Highways England has no plans to look at improving the A3 before 2020. It is therefore not sustainable to identify sites for further development which will worsen the congestion on these motorways and trunk roads.

Congestion on the local village roads and lanes
Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. I object to further development which will cause greater congestion in and around our villages.

Unsuitability of our local roads for heavy vehicles and more traffic
Many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.
Poor air quality concerns
Further congestion, particularly in built up residential areas will only lead to greater levels of air pollution. I object to further development, which will result a fall in the air quality.

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

Attached documents:

Comment ID: PSLPP16/10909  Respondent: 10866721 / Andy Court  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

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

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

Sites being planned in unsustainable locations
Many of the strategic sites e.g. Wisley Airfield and Garlick’s Arch, are in unsustainable locations. They do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. I object on the grounds that these sites are not sustainable.

Parking issues in local villages caused by larger population
Many of the affected villages, such as Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems. To which I object.

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

Attached documents:

Comment ID: PSLPP16/10913  Respondent: 10866721 / Andy Court  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

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

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

No protection of the environment
Insufficient consideration of SPA, SSI and Conservation Area issues

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

Attached documents:
I object to the latest plan to remove our greenbelt for development. I was going to highlight all my concerns but after seeing the Ripley action groups website their specific points say it all.

I do not understand why councils/government do not look to build more towns well away from existing villages/towns as they did years ago with Milton Keynes. Building within existing villages totally over runs them and there are never amenities put in place to cope with schooling, doctors surgeries and traffic management. If there is an incident on either the A3 or the M25 it becomes totally gridlocked in Send Marsh/Send/Ripley as all the A3 traffic comes off and through Ripley.

I OBJECT STRONGLY

1. Not protecting the Green Belt
   I object to the proposals to remove Ripley, Send and Clandon from the Greenbelt. There are no special circumstances to do this. Once taken the green belt is lost forever.

2. Disproportionate size of sites in relation to rural locations
   I object to the allocation of land to the strategic sites of Wisley Airfield, Garlicks Arch (Ripley/Send border) and Gosden Hill (Clandon). The proposed development of these sites will have a disproportionate impact on the surrounding local villages. They will have a permanent impact on each of these communities.

3. Unbalanced allocation of development in one area of the Borough
   Between the M25 and Burpham, a distance of only about 5 miles it is proposed that over 6,500 houses are built. This represents over 40% of the housing proposed in the Local Plan. I object to this area being hit so hard by the allocation of development, which is disproportionate to the rest of the Borough.

   I object to the development of the strategic sites due to A3 and M25 already being at capacity during peak hours. Highways England has no plans to look at improving the A3 before 2020. It is therefore not sustainable to identify sites for further development which will worsen the congestion on these motorways and trunk roads.

5. Congestion on the local village roads and lanes
   Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. I object to further development which will cause greater congestion in and around our villages.

6. Unsuitability of our local roads for heavy vehicles and more traffic
   Many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

7. Poor air quality concerns
   Further congestion, particularly in built up residential areas will only lead to greater levels of air pollution. I object to further development, which will result a fall in the air quality.

8. Lack of proper infrastructure planning for sites
   I object to the lack of planning and implementation of infrastructure. For example at Garlick’s Arch. Without improvements to the infrastructure prior to development, the existing residents’ quality of life will significantly deteriorate in many ways. How will the local services such as doctors and schools cope?

9. Lack of Utilities Capacity
   Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. I object to the development of Garlick’s Arch on the ground that there is little capacity in these networks.
10. Sites being planned in unsustainable locations
   Many of the strategic sites e.g. Wisley Airfield and Garlick’s Arch, are in unsustainable locations. They do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. I object on the grounds that these sites are not sustainable.

11. Parking issues in local villages caused by larger population
   Many of the affected villages, such as Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems. To which I object.

12. Local healthcare facilities will be overwhelmed
   Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. I object due to the further stress it will put upon existing health services.

13. Local policing facilities will be overwhelmed
   Police services are seeing funding reduced. The development of the likes of Garlick’s Arch and Wisley Airfield will stretch the police services further and I object.

14. Local social welfare facilities will be overwhelmed
15. Local shops/restaurant facilities will be overwhelmed

16. No protection of heritage assets
17. No protection of the environment
18. Overdevelopment of sites
19. Not meeting the needs of local communities
20. Insufficient affordable housing
21. Poor quality of layout and housing design
22. Insufficient consideration of SPA, SSI and Conservation Area issues
23. Lack of proper cycle lanes on local roads
24. Lack of proper pedestrian footpaths on local roads

25. Current SHMA figure of 693 p.a. too high

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

Attached documents:

Comment ID: PSLPP16/10906  Respondent: 10866721 / Andy Court  Agent:  

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

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

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

Not protecting the Green Belt
I object to the proposals to remove Ripley, Send and Clandon from the Greenbelt. There are no special circumstances to do this. Once taken the green belt is lost forever.

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

Attached documents:
Disproportionate size of sites in relation to rural locations
I object to the allocation of land to the strategic sites of Wisley Airfield, Garlicks Arch (Ripley/Send border) and Gosden Hill (Clandon). The proposed development of these sites will have a disproportionate impact on the surrounding local villages. They will have a permanent impact on each of these communities.

Unbalanced allocation of development in one area of the Borough
Between the M25 and Burpham, a distance of only about 5 miles it is proposed that over 6,500 houses are built. This represents over 40% of the housing proposed in the Local Plan. I object to this area being hit so hard by the allocation of development, which is disproportionate to the rest of the Borough.

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

Attached documents:
I object to Policy A42 because
1/The current plans will be an over development of our village, already increased from 45 to 60 homes from the last plan.
2/You are ignoring thousands of previous objections
3/Will cause surface water flooding
4/Will create excessive traffic through the already busy village
5/Takes away the current greenbelt and open countryside.

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

Attached documents:

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I object to Policy A43 because;
There is no proven necessity for travellers sites
Again ignores thousands of previous objections
Has an excessive amount of new homes
Eliminates ancient woodland
Will have a massive impact on the amount of traffic which already is congested on a weekly basis.

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

Attached documents:

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I object to Policy A43 because;
There is no proven necessity for travellers sites
Again ignores thousands of previous objections
Has an excessive amount of new homes
Eliminates ancient woodland
Will have a massive impact on the amount of traffic which already is congested on a weekly basis.

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

Attached documents:
I object to Policy A58 because;
1/Why build industrial/warehouse development on green belt
2/Again it will cause additional traffic including heavy goods wrecking the already pot holed roads.
3/Defeats the purpose of green belt

Being a local home owner I am totally bemused that again the council is not listening to its residents. I have lived in Send Marsh all my life and year on year the area is being reduced to a housing estate, each new proposed house will include a minimum of 2 vehicles equating to at least 920 additional cars on the roads increasing pollution and congestion on roads that cannot currently cope especially during the rush hour.

You need to completely change the current road structure, add additional schooling and surgeries before you contemplate building more houses as required by law.

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

Attached documents:

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Comment ID: PSLPS16/85  Respondent: 10866785 / Laurie McKeague  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

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

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

I object to the building of houses on what was a landfill site.
I object because I paid high price for my property to have an open aspect overlooking green belt land.
I object because it will devalue my property
I object to having traveller pitches in a well established good residential area.
I object because of increased traffic on a narrow road with no footpaths and limited lighting.
I object because of the increased population where the gp surgery and local schools are already stretched to the limit.
I object because I feel that the Un - necessary use of green belt land where there are brown sites that should be used.
I object because this site is new and was not included in the regulation 18 draft and has not been consulted upon previously.

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

Attached documents:

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Comment ID: PSLPA16/3371  Respondent: 10866881 / Mike Pinder  Agent:

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

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

I’m contacting you to state my opposition to the Draft Local Plan.

I live in East Horsley and have done so for 8 years. My address is [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

The revised plan appears to have made little consideration to the views I and others expressed against the earlier iteration.

I am particularly concerned about plans for East and West Horsley. To wholesale remove from the greenbelt is utter nonsense. To allow organic growth through individual applications, use of brown-field sites and an application by application based consideration of individual applications on greenbelt would allow the villages and sense of community to remain.

Allowing them to be removed from the greenbelt and thus allowing excessive building will be detrimental to the villages, community and Guildford as a whole. Adequate consideration has to be made of the environment, impact on infrastructure (trains and roads) for these areas and Guildford as a whole in any plans made. That is why it is essential to consider plans on an organic basis, rather than wholesale removal from greenbelt.

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

Attached documents:

Comment ID: pslp173/651  Respondent: 10866881 / Mike Pinder  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley

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

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

I am an East Horsley resident. I would like to register my objection to the latest version (summer 2017 consultation) of the Local Plan. There has been very little change from the previous version, which I also opposed, with very little being done to address the thousands of sensible concerns made by residents regarding the contents of the previous version. This is not a plan that residents can adopt and support – it is a plan that seems set on building as many homes as possible in places that cannot support the level of development planned.

There has been a reduction in the number of houses for the Horsleys, but I continue to object to the local plan on the grounds of the number of houses being proposed not only in the Horsleys but in other rural villages in the Guildford Borough which don’t have the infrastructure or capacity to absorb so many more houses.

I also object to the plan on the basis that despite requests being made to GBC to reveal the methodology behind the housing calculations, this has been kept secret from residents who are now being asked to blindly approve a plan whose foundations they cannot validate. Two independent studies of the housing numbers suggest that the housing numbers used by Guildford Borough Council in their local plan are significantly higher than they should be.
There has been no explanation as to why GBC has not applied the constraints that they are entitled to do. Residents have asked for a reduction in the housing numbers however GBC continue to push ahead with this flawed plan that does not take the wishes and views of its residents into account. I have to question why the Conservative led Council, whose election manifesto was to protect the Green Belt, is so determined to build so many more houses than they have to and so many more houses than its residents want. Is there a financial benefit to the Council in doing so?

I fully understand that there is a need for more houses in this area and I support building more houses. However, it is important that the following happens before thousands of houses are built unnecessarily on the green belt:

- The housing need calculation needs to be made available and shown to be accurate and appropriate for the area. If it is correct, why are GBC keeping this hidden from their residents? If it is found to be incorrect, the housing numbers need to be revised downwards as appropriate in a transparent manner.
- The housing constraints that GBC are allowed to apply need to be applied, so that GBC can properly demonstrate their commitment to residents to protect the Green Belt, made in the election but now so conveniently forgotten.
- Existing options for housing such as student accommodation & empty properties need to be fully explored before new houses are built on Green Belt land.
- Consideration needs to be given to the types of housing being proposed and built. There is a need for affordable housing the Horsley area; this does not mean 4 bedroom houses costing upwards of £500k.
- There is a need for proper plans to be made in relation to infrastructure. Currently Surrey County Council are cutting back on funding on roads, street cleaning, vegetation cutting, recycling etc. There needs to be assurance that where many houses are being proposed where there is no infrastructure to support this, that this is provided for in advance of the houses being ready, so that the local plan does not have a hugely detrimental effect on the lives of those already living in these communities. Currently there is pressure on facilities such as the local medical centre, local schools such as The Raleigh and local roads without the local plan.

I ask you to take into account the opposition views of so many local residents to this plan and reject this plan outright.

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

Attached documents:

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Comment ID: PSLPS16/1896  Respondent: 10866945 / Kristine Good  Agent:

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

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

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

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I Object to building 45 houses at Clockbarn Nursery, as the Tannery Lane is to narrow and twisty making it hazardous for increased flow of traffic and the junction with Send Road is difficult to negotiate, especially at busy times forcing errors to be made and accidents occurring.

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

Attached documents:

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Comment ID: PSLPS16/1897  Respondent: 10866945 / Kristine Good  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

I object to the development at Garlick’s Arch for 400 houses and 7000 sq metres industrial space, firstly because it was sprung on the village at the last moment with only 2 weeks’ notice and without any prior consultation and is not required in terms of housing need either for the village or the borough. Secondly This GREEN BELT SITE is liable to flooding and it is covered by ancient woodland, providing an invaluable barrier from the noise pollution from the A3 and providing relief from air pollution caused by the huge volume of traffic flowing in this area. It is not needed as there are still brown field sites such as Slyfield which can be used, Figures from Guildford Borough Council on projected housing requirements have been shown to be grossly inflated and I believe they have yet to give details on how these calculations have been formulated.

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

Attached documents:

Comment ID: PSLPS16/1894  Respondent: 10866945 / Kristine Good  Agent:  

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

I object to a new interchange for the A3 at Burnt Common. This is because the local roads connecting from there through Send to Woking are unable to cope with current traffic flow at peak times, increased traffic will not be able to be accommodated. Send Barns Lane, Send Road, Broadmeads, will be constantly gridlocked as this is frequently illustrated when any form of road works takes place between Burnt Common and Old Woking. This increased volume of traffic will lead to excessive and unreasonable levels of noise and pollution.

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

Attached documents:

Comment ID: PSLPS16/1898  Respondent: 10866945 / Kristine Good  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44
I object to 40 houses /2 traveller sites at SEND HILL, again because it is a narrow single width road and not suitable for additional traffic. Also because the site has previously been used for land fill making it unsuitable for residential use. In addition a large development here would not be in keeping with its surroundings, currently open countryside.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4098</th>
<th>Respondent: 10866945 / Kristine Good</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.

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

Attached documents:

<table>
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<th>Comment ID: PSLPP16/4096</th>
<th>Respondent: 10866945 / Kristine Good</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</tbody>
</table>

I request that my objections to the Guildford Borough Local Plan are shown to the Planning Inspector.

I object to Send Village being removed from the GREEN BELT. Send's green belt provides an essential buffer preventing Woking and Guildford becoming one large sprawling conurbation, and the green belt is essential to retaining its village character. More cars, more heavy lorries, more congestion, more industrial building, more houses will put unprecedented strain on our village and change its character and residential village living experience for ever which can never be regained. This disregard of existing green belt is in breach of previous manifesto promises by local and central government and contrary to previous public consultations.

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

Attached documents:

| Comment ID: PSLPP16/4097 | Respondent: 10866945 / Kristine Good | Agent: |
I object to the large proposed development at 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce further congestion on the A3 and surrounding roads including Send.

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

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

Attached documents:

Comment ID: PSLPP16/4099  Respondent: 10866945 / Kristine Good  Agent: 

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

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

Attached documents:
I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough, Send has not been properly consulted and all its sites have been changed substantially from the original plans published.

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

Attached documents:

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Comment ID: PSLPA16/3277  Respondent: 10867009 / Paul Good  Agent:

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

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

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

I object to Send Village being removed from the GREEN BELT. Send's green belt provides an essential buffer preventing Woking and Guildford becoming one large sprawling conurbation, and the green belt is essential to retaining its village character. More cars, more heavy lorries, more congestion, more industrial building, more houses will put unprecedented strain on our village and change its character and residential village living experience for ever which can never be regained. This disregard of existing green belt is in breach of previous manifesto promises by local and central government and contrary to previous public consultations.

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

Attached documents:

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Comment ID: PSLPA16/3278  Respondent: 10867009 / Paul Good  Agent:

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

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

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

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Comment ID: PSLPS16/6415  Respondent: 10867009 / Paul Good  Agent:

I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough, Send has not been properly consulted and all its sites have been changed substantially from the original plans published.

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

Attached documents:
Page 85 of 2167
I object to a new interchange for the A3 at Burnt Common. This is because the local roads connecting from there through Send to Woking are unable to cope with current traffic flow at peak times, increased traffic will not be able to be accommodated. Send Barns Lane, Send Road, Broadmeads, will be constantly gridlocked as this is frequently illustrated when any form of road works takes place between Burnt Common and Old Woking. This increased volume of traffic will lead to excessive and unreasonable levels of noise and pollution.

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

Attached documents:

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Comment ID: PSLPS16/6418  Respondent: 10867009 / Paul Good  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

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

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

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I object to 40 houses /2 traveller sites at SEND HILL, again because it is a narrow single width road and not suitable for additional traffic. Also because the site has previously been used for land fill making it unsuitable for residential use. In addition a large development here would not be in keeping with its surroundings, currently open countryside.

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

Attached documents:

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Comment ID: PSLPP16/13454  Respondent: 10867009 / Paul Good  Agent:

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

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

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

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

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

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

Attached documents:
| Comment ID: PSLPP16/13452 | Respondent: 10867009 / Paul Good | Agent: |
|---------------------------------------------------------------|
| **Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
| **Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )** |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
| I object to the large proposed development at of 2,000 houses at *Wisley Airfield*, 2,000 houses at *Gosden Hill* and 1,850 houses at *Blackwell Farm* because it will destroy large areas of Green Belt and agricultural land and produce further congestion on the A3 and surrounding roads **including Send**. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

| Comment ID: PSLPP16/13455 | Respondent: 10867009 / Paul Good | Agent: |
|---------------------------------------------------------------|
| **Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |
| **Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )** |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
| I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan. |
| Please confirm this letter has been received. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

| Comment ID: PSLPA16/3162 | Respondent: 10867105 / Steve Loosley | Agent: |
|---------------------------------------------------------------|
| **Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base |
| **Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )** |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

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

Attached documents:

Comment ID: PSLPA16/3163  Respondent: 10867105 / Steve Loosley  Agent:

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

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

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

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

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

Attached documents:

Comment ID: PSLPS16/6284  Respondent: 10867105 / Steve Loosley  Agent:

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

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

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

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

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

Attached documents:

Comment ID: PSLPS16/6282  Respondent: 10867105 / Steve Loosley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

I object to building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.

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

Attached documents:

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Comment ID: PSLPS16/6281  Respondent: 10867105 / Steve Loosley  Agent:

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

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

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

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

10. I object to the development at Garlick’s Arch because the site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The site is also subject to flooding.

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

Attached documents:

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Comment ID: PSLPS16/6280  Respondent: 10867105 / Steve Loosley  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25.

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

Attached documents:

Comment ID: PSLPS16/6283  Respondent: 10867105 / Steve Loosley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

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

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

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

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

Attached documents:

Comment ID: PSLPP16/13095  Respondent: 10867105 / Steve Loosley  Agent:

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

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

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

I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford.

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

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

Attached documents:

Comment ID: PSLPP16/13096  Respondent: 10867105 / Steve Loosley  Agent:

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

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

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

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

Attached documents:

Comment ID: PSLPP16/13097   Respondent: 10867105 / Steve Loosley   Agent:

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

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

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

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

16. I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

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

Attached documents:

Comment ID: SQLP16/1546   Respondent: 10867105 / Steve Loosley   Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.

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

Attached documents:

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Comment ID: pslp173/244  Respondent: 10867105 / Steve Loosley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

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

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

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I object to the proposal to inset Send Business Park from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

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

Attached documents:

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Comment ID: pslp172/2183  Respondent: 10867105 / Steve Loosley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

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

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

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I object to the Policy A42 change at Clockbarn in Tannery Lane because:

- The increase to 60 homes in place of 45 homes is 33% more and too much
- It ignores all the hundreds of previous objections made by local people
- It will worsen access and traffic problems in Tannery Lane and at the A247 junction
- It will make erosion of the Green Belt in our village worse
- It will make surface water flooding, which is already bad, even worse
- It will impact open countryside views from the River Wey Navigation

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

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**Comment ID:** pslp172/2181  **Respondent:** 10867105 / Steve Loosley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

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

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

I object to the Policy A43 change at Garlick’s Arch because:

- It ignores all the **thousands of previous objections** made by local people
- There is no proven demand for Travelling Showpeople plots in this location
- It is beautiful permanent Green Belt and no “exceptional circumstances” exist
- It will cause over-development of our village and the number of homes is excessive
- It is exquisite ancient woodland that existed at the time of Elizabeth 1
- It will join up Ripley and Send and defeat the key purpose of Green Belt
- It is subject to frequent flooding and is currently a flood zone 2 allocation
- It is contaminated by lead shot accumulated over fifty years
- It will generate excessive traffic that will block up the local roads of Send and Ripley

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

Attached documents:

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**Comment ID:** pslp172/2179  **Respondent:** 10867105 / Steve Loosley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy A 58 at Burnt Common because:

- **It was deleted from the 2014 draft** because of all the objections made previously.
- The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land.
- There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt.
- The impact on small surrounding roads will create traffic gridlock.
- It will join up existing villages and defeat the purpose of the Green Belt.

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

Attached documents:
Comment ID: PSLPS16/6475  Respondent: 10867137 / Richard Moore  Agent:

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

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

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

I object to the way in which the Garlick’s Arch development was added to the local plan. There is no need for 400 houses in addition to the 13,860 proposed for the borough. This proposal has not been consulted upon. A new 4 way interchange would cause traffic chaos on already congested roads in the village of Send.

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

Attached documents:

Comment ID: PSLPS16/6477  Respondent: 10867137 / Richard Moore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

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

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

I object to Policy A44. 1.9ha Land West of Winds Ridge and Send Hill. This site designated for 40 homes and 2 traveller pitches is new and has not been consulted upon. Development for housing is inappropriate due to its Green Belt Status and the road is too narrow to provide sufficient access to the site proposed for the traveller pitches.

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

Attached documents:

Comment ID: PSLPP16/13535  Respondent: 10867137 / Richard Moore  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object that little attention has been paid to infrastructure.
I object to all the additional houses when the local schools are already at capacity.

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

Attached documents:

Comment ID: PSLPP16/13534  Respondent: 10867137 / Richard Moore  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

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

I strongly object to the amount of Green Belt being removed from Send/Ripley in the new local plan.
I object to Policy P2 and believe that Send should not be removed from the Green Belt.

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

Attached documents:

Comment ID: SQLP16/1600  Respondent: 10867137 / Richard Moore  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

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

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

I object to the fact that Guildford Borough council have not followed the correct process. The new proposal for 485 homes requires another full consultation under Regulation 18.

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

Attached documents:

Comment ID: PSLPA16/4480  Respondent: 10867169 / Saskia Lawson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

This is my objection to the local plan of 2016, and my plea you think very carefully about sights 46 & 47 of Normandy and Flexford.

Thanks for taking the time to read this, I’m sure you have had many objections and responses to the local plan but please do take this into consideration.

My name is Saskia, [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] and I live in Normandy. I’ve lived here for the past 12 years.

In those 12 years I have attended 3 schools, one being Wyke Primary on my road, my secondary school Ash Manor and my college Farnborough Sixth Form.

I have also learnt to drive and set up my own business at home.

In those years I have never once felt isolated and I have never struggled to get in to OR physically get to my school. Travelling here was fine thankfully for buses and kind parents I wasn’t deprived. Ash isn’t really that far you know… I understand your main want for the fields behind my house is for a secondary school (as well as a lot of houses), but I don’t understand why as there is 0 need for this school. Keith Witham has pointed out (what we already knew) and even discovered Kings in Guildford is 57% undersubscribed?! Cmon now. Kings is not far away. Pump some money saved from wasting on the ‘Normandy’ school and sort Kings out, its in a good area, easy to get to and even better its not on the greenbelt. Most of my friends attended that school and there is obviously not enough children in this area to fill up the school. Ash Manor where I studied is also undersubscribed, between those 2 schools you could fit a load of kids. I’m sure over the years these schools will grow AND both head masters have mentioned they are willing to make their schools bigger and create room for more children as the population grows. There is seriously no need to ruin the greenbelt and our fields for an un-needed school! I understand it would feel like a great accomplishment to set up a new school, it would look great for you guys, but seriously come walk through Normandy with me and then think about it. It’s a teeny weeny village with shocking roads and junctions, people speed down the roads and when they aren’t speeding they are sat in traffic from the traffic lights and Ash Station crossing. Add in the new school traffic and traffic from the new homes and well won’t that be a joy.

Can’t explain how often I am nearly hit as I pull out of Westwood Lane, its just not suitable for more cars. Out of most people in this village I am seriously FOR building new houses, I am 23 and still cannot leave home because there’s nowhere to live. But what I care more about is the village I grew up in and the carelessness of the developers. Our village floods regularly, my pet pig who lives in Westwood Lane could tell you how muddy it gets…

I’m pretty sure if you build over that flood plain the water that sits there will shift down onto my where we live, for selfish reasons yes that won’t be pleasant but I live on a main road, unless these cars turns inflatable like Chitty Chitty Bang Bang I don’t think it will work out great.

There is just so many reasons you should not build they completely out weigh everything else. I worry the want and need for this new school will blind everyone, we are all SO aware that we don’t need a school so why aren’t you?

As a young woman I have such little trust in politicians and councillors which is sad, I don’t think you’ll read these emails and I don’t think you care what mess will be left behind when you build these new houses.

This is a tiny village and it cannot take what you propose, please look into using other areas that provide stronger roads and will do less damage to our countryside.

If you read this all thank you. As silly as it sounds - PLEASE don’t do it!
**Comment ID:** PSLPA16/3314  **Respondent:** 10867329 / Anna Moore  **Agent:**

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

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

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

I object to the lack of evidence that these high numbers of houses are actually needed

**Comment ID:** PSLPA16/267  **Respondent:** 10867329 / Anna Moore  **Agent:**

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

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

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

I live in the village of Send and I **strongly object** to the amount of Green Belt being removed from Send/Ripley in the new local plan.

I object to Policy P2 and believe that Send should not be removed from the Green Belt.

I object to the fact that Guildford Borough council have not followed the correct process. They have changed every major site in Send proposed for development since 2014. The new proposal for 485 houses, being such a significant increase (previously 185) requires another full consultation under Regulation 18.

I object to the way in which the Garlick’s Arch development was added to the local plan. This site is new and was not included in the Regulation 18 draft and has NOT been consulted upon previously. The proposed development and a new 4 way interchange onto the A3 to serve this development would be catastrophic for Send and the already congested roads would be gridlocked all day.

I object to the lack of evidence that these high numbers of houses are actually needed.
I object to all the additional houses when the local schools are already overwhelmed with new applicants. The school in Send has no capacity to accommodate additional children.

I object to all the additional houses as the local doctors surgery is already at its full capacity and this will put additional pressure on services. Infrastructure overload has received little attention.

I object to the additional amount of cars that will be on the road in the immediate and surrounding areas, causing further risk to our children as they travel to and from school.

I object to Policy A44. 1.9ha Land West of Winds Ridge and Send Hill. This site designated for 40 homes and 2 traveller pitches is new and has not been consulted upon. Development for housing is inappropriate due to its Green Belt Status and the road is too narrow to provide sufficient access to the site proposed for the traveller pitches.

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

Attached documents:

Comment ID: PSLPA16/3313   Respondent: 10867329 / Anna Moore   Agent:

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

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

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

I object to all the additional houses when the local schools are already overwhelmed with new applicants. The school in Send has no capacity to accommodate additional children.

I object to all the additional houses as the local doctors surgery is already at its full capacity and this will put additional pressure on services. Infrastructure overload has received little attention.

I object to the additional amount of cars that will be on the road in the immediate and surrounding areas, causing further risk to our children as they travel to and from school.

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

Attached documents:

Comment ID: PSLPS16/6472   Respondent: 10867329 / Anna Moore   Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the building of 45 houses at Clockbarn Nursery because of inadequate access and traffic volume. Tannery Lane is far too narrow and is not able to sustain the level of traffic that this would create. This lane is already very dangerous and will be made much worse.

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

Attached documents:

I object to Policy A44. 1.9ha Land West of Winds Ridge and Send Hill. This site designated for 40 homes and 2 traveller pitches is new and has not been consulted upon. Development for housing is inappropriate due to its Green Belt Status and the road is too narrow to provide sufficient access to the site proposed for the traveller pitches.

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

Attached documents:

I object to the fact that Guildford Borough council have not followed the correct process. They have changed every major site in Send proposed for development since 2014. The new proposal for 485 houses, being such a significant increase (previously 185) requires another full consultation under Regulation 18.

I object to the way in which the Garlick’s Arch development was added to the local plan. This site is new and was not included in the Regulation 18 draft and has NOT been consulted upon previously. The proposed development and a new 4 way interchange onto the A3 to serve this development would be catastrophic for Send and the already congested roads would be gridlocked all day.

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

Attached documents:
1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

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

Attached documents:
1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.
12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.
13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.
14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.
15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.
16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.
17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists pass through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

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

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

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

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

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

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Witley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

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

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

Attached documents:

Comment ID: pslp172/4508  Respondent: 10867585 / Hugh Shanks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m say to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justift the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

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

Attached documents:

Comment ID: pslp171/2940  Respondent: 10867585 / Hugh Shanks  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

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

Attached documents:

Comment ID: pslp17q/570  Respondent: 10867585 / Hugh Shanks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

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

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

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

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

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

Attached documents:

Comment ID: PSLPA16/106  Respondent: 10867873 / Dave Govey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send
As a resident of Send Village and living on the busy A247 I can see no sense whatsoever in enlarging the A3 Junction as described in A43.30 and I OBJECT to the council plans which are both short sighted and thoughtless with regard to the local residents.

I OBJECT to the removal of 15 villages, including Ripley and Send, from the green belt. This will lead to wholesale, and often inappropriate developments.

I OBJECT to the fact that GBC have not followed the correct process for Send and Ripley developments. Any significant changes to the 2014 proposals, such as the proposal development of Garlicks Arch, should have required another full consultation, which did not happen. This invalidates the whole process.

I OBJECT to the fact that GBC have failed to provide sound evidence in terms of the Employment Land Needs Assessment which shows that industrial space at Burnt Common IS NO LONGER NEEDED.

I OBJECT to Policy A43.30 the proposed development of Garlicks Arch designated for 400 houses and an industrial estate. This is a new site not included in the Regulation 18 draft and has NOT been consulted on previously. It is not only permanently protected green belt but also a site of ancient woodland with some trees planted in the 16th century.

I OBJECT to policy A43.30 the development of new four way interchange onto the A3 which would mean that narrow Send Road (A247) would be the main route for traffic leaving the M25 and A3. It is already crowded and vulnerable to traffic jams. Further traffic from this development would result in permanent gridlock. It simply would not work.

I OBJECT to policy A44 which would see 40 homes and two travellers' pitches on land west of Winds Ridge and Send Hill. This was again a NEW site NOT included in 18 draft and therefore has NOT been consulted on previously. Once again this is Green Belt land partly containing unsafe landfill. Access is by a narrow lane which could never take the volume of traffic that would ensue from traveller's pitches.

I OBJECT to the fact that the Local Plan takes no account of schools, doctors surgeries and roads that are already operating at full capacity. Another 4000 houses in this area with a conservative estimate of a further 8000 cars would be catastrophic.

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

Attached documents:
I’m writing to object to the proposed local plan for Send and surrounding areas. I attended a local meeting in June where the proposals were set out. The evidence presented left me with several concerns and the impression that the local plan is ill conceived with no quantifiable need identified to justify the large number of proposed dwellings in the Send area.

The following aspects of the plan do not appear to have been adequately considered or have been dismissed;

- Environmental impact
- Adverse effect on local infrastructure
- Additional traffic
- Appropriateness of high density housing sites in what is essentially a semi-rural community
- The redesignation of Green Belt land for development - Green Belt Policy Guidelines (NPPG 79-83) sets out to protect open space, prevent encroachment into the countryside and stop linear development leading to the joining together of developed communities all of which appear to have been ignored in the Send proposals.

My specific objections are as follows;

I object to the 440 additional houses proposed for the two sites (A43 and A44) which will overload our already busy local and trunk roads and put pressure on the local amenities and services, such as the Three Villages Surgery, where it is nearly impossible to see my own GP the same day.

I object to the proposal to redraw the green belt boundary for Send and, hence, for Send Village to be removed from the Green Belt. The Green Belt was intended to be permanent, as required by the National Planning Policy Framework, and there are no special circumstances to justify abandoning it. Send's Green Belt provides an essential buffer stopping Woking and Guildford becoming one conurbation. Local councillors and central government gave a clear election promise to protect the Green Belt and this reneges on it. Developers will be quick to take advantage and there will be nothing to stop them.

I object to building 400 houses and 7000 sq metres of industrial space at Garlick's Arch, opposite Send Marsh Road (A43). The site floods and is covered by ancient woodland. The industrial space is not needed but if it were it should be at Slyfield. With proper use of brownfield sites this Green Belt site is not needed.

I object to the development of 40 houses and 2 travellers’ pitches at Send Hill (A44). It is an inappropriate location because the narrow width single access country road provides insufficient access. The subsoil of the proposed site contains documented unsafe landfill waste registered at GBC. Any development there would spoil a high amenity area set in beautiful countryside.

I object to a new interchange with the A3 at Burnt Common (A43a) because Send would have to take traffic from the proposed 2000 new houses at Wisley Airfield, 2000 houses at Gosden Hill, Burpham and 1850 at Blackwell Farm. Much of this traffic to and fro the A3, M25, Woking and Guildford would go through Send. Send Road, which is already overloaded, would become gridlocked. Noise and pollution levels, already at excessive levels, would worsen.

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

**Attached documents:**
There are several areas I am concerned about, but to pick a few, allowing Green Belt development to pay for transport schemes will simply generate more traffic from more homes, fuelling congestion.

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

Attached documents:

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Comment ID: PSLPA16/1803  Respondent: 10868097 / Andrew Donnelly  Agent:

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

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

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

With the country about to negotiate Brexit now is not the time to start making massive changes, until we know what direction we will be moving in and how our economy will be effected.

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

Attached documents:

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Comment ID: PSLPP16/7808  Respondent: 10868097 / Andrew Donnelly  Agent:

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

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

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

Brownfield opportunities are being ignored, transport evidence is not yet fit for use and major transport issues are unresolved.

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

Attached documents:

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Comment ID: PSLPS16/4704  Respondent: 10868161 / Nicola Ford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

I OBJECT to Policy A25 Gosden Hill as being totally a inappropriate and unsustainable development of 2000 homes in the GreenBelt which will cause coalescence and urban sprawl from Burpham to West Clandon

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

Attached documents:

Comment ID: PSLPS16/4672  Respondent: 10868161 / Nicola Ford  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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

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

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt.

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

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

Attached documents:

Comment ID: pslp173/361  Respondent: 10868161 / Nicola Ford  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Normandy and Flexford

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
We live in Normandy and are writing about the proposed changes to the Local Plan.

Firstly we strongly support the recent removal of sites A46 and A47 from the Local Plan. As we commented during the last consultation last summer, the land is in the Green belt, overlooked by the Hogs Back AONB, and there are no exceptional circumstances to cause it to be removed from the Green Belt. Also the local infrastructure would not have been able to cope with providing the required utilities and roads for the development.

Secondly we need to object to the proposed inset of homes in Guildford road, and the northern end of Glaziers Lane, Normandy, Flexford, Walden cottages and Palm House Nurseries travellers site. If placed outside of the Green Belt, this would set a president for heavy development, which would ruin the openness of the Green Belt.

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

Attached documents:

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Comment ID: PSLPS16/462  Respondent: 10868193 / Ron and Charmian Leach  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43  

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

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

I object to 400 houses being built Burnt Common and 7000 sq m. of industrial buildings. This is green belt and more building is simply not needed here.

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

Attached documents:

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Comment ID: PSLPS16/463  Respondent: 10868193 / Ron and Charmian Leach  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44  

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

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

I object to more houses and traveller's pitches on Send Hill. The Subsoul of the existing sites contain unsafe land fill. My husband actually worked on the original site when it was documented unsafe land.

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

Attached documents:
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to traveller's pitches on Send Hill. Travellers Pitches existed some years ago illegally. Their traffic caused many accidents and chaos in those days. I live close by and remember well how bad it was. The country road is very narrow. In conclusion I would urge Guildford Borough Council to please think again about needlessly destroying out beautiful countryside.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I wish to object strongly to the final draft local plan which will devastate Send, Ripley and the outstanding countryside forever.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</tbody>
</table>
I object to the removal of Send from the Green Belt

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

Attached documents:

Comment ID: PSLPA16/1895  Respondent: 10868225 / Suzie Maine  Agent:

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

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

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

I write to register my objection to the planned changes to Send and Send Marsh outlined in the revised Draft Local Plan.

The retention of the Green Belt is, I feel, the most vital issue in the Local Plan. It must not be slackened to allow expansion, but kept to protect the character and rural distinctiveness of the countryside and to keep villages as just that, villages and not large sprawling towns.

I object to the proposals to remove Send from the Green Belt, together with site on the Land lest of Winds Ridge and Send Hill (A44). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for Send or the land to be taken from the Green Belt.

Removing the green belt status from Send serves no purpose other than to facilitate the future development of the village and I strongly object to the proposals. It is not acceptable to set in motion through underhand methods the loss of this valuable, heavily used recreational space that the local populace of all age groups currently enjoy.

The loss of significant swathes of greenbelt land will have a very detrimental impact upon the social, leisure and recreational activities that the local population currently use this land for – football, walking, rambling, dog walking, exercise, usage by young people. In particular young people will have less natural open space and green fields within which to exercise and socialise. At a time when childhood obesity is on the rise, allow the insiting of this land and future development will have a detrimental impact on achieving this objective as vital areas for play and exercise will be lost, impacting upon both child and adult health.

Removing the greenbelt status would jeopardise the habitats of numerous species of wildlife. The fields are home to many wildlife species such as bats, badgers, rabbits and many many more, along with wild plants which should all be protected. The council has a duty to protect woodland and the wildlife under the UK BIO Diversity Action Plan.

The NPPF states that new Green Belt boundaries should only be established in exceptional circumstances, for example when planning for larger scale developments such as new settlements or major urban extensions. If proposing a new Green Belt, local planning authorities should:

1. demonstrate why normal planning and development management policies would not be adequate;
2. set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;
3. show what the consequences of the proposal would be for sustainable development;
4. demonstrate the necessity for the Green Belt and its consistency with local plans for adjoining areas;
5. and show how the Green Belt would meet the other objectives of the framework.
I question whether the removal of the Green Belt in and around Send has been shown to meet any of the above requirements. There is no evidence presented in the Core Strategy to demonstrate that the proposed strategic extension meets the fundamental aim of Green Belt policy.

The NPPF (para 85, bullet point 6) requires LPAs to define boundaries clearly, using physical features that are readily recognisable and likely to be permanent. The removal of the Green Belt does not relate to any physical features on the ground and does not fulfil this criterion. The lack of physical features against which the proposed boundary is drawn highlights the inappropriateness of the proposed Green Belt removal and the lack of justification for its insetting.

Whilst I wholeheartedly object to the green belt removal plans, should their inclusion in the Local Plan be forced through, the Council must clearly demonstrate that the new boundaries take account of the need to promote sustainable patterns of development as required by paragraph 84 of the NPPF. The Council must review the boundaries of those settlements which would be covered by the Green Belt to ensure that sites are identified for development to achieve their long term sustainability and clearly define the reason for the insetting, fully detailing the future usage of the inset land.

Importantly if the Council chooses to continue with the alteration, it is essential when submitting the Core Strategy for examination that it is considered 'sound' in that it is justified with the plan being the most appropriate strategy, when considered against reasonable alternatives, based on proportionate evidence.

Allowing the removal of Send from the Green Belt, and thereby facilitating the future development of the village, will allow the urban sprawl of Guildford and Woking to further encroach on Send. Send is not a suburb of Guildford or Woking and clear separation should be maintained by the retention of the current Green Belt boundary.

The proposed development on Send Hill is within Site of Nature Conservation Interest and is Grade 2 (very good) agricultural land. Access roads leading to the site are already congested, and will be further congested if the proposed A3 entry and exit ramps at Burnt Common are implemented due to the large increase in traffic through the village. This site is not suitable for development.

I urge the council not to consider insetting Send from the Green Belt and set in motion future development of these spaces, but to focus on the numerous unused BROWNFIELD sites that exist throughout the Borough. These would more than meet the current housing demand, once this is properly defined within the Local Plan.

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

Attached documents:

Comment ID: PSLPA16/3573  Respondent: 10868513 / Tom Stevenson  Agent:

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

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

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

The West Surrey Strategic Housing Market Assessment is shot through with holes. In particular it is guilty of double counting. Starting with an annual target of 517 new homes each year based on official government growth figures, you have then added more homes to account for economic growth and for affordable housing, which are already included in the government figures. This is outrageous.

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

Comment ID: PSLPA16/3583  Respondent: 10868513 / Tom Stevenson  Agent:

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

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

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

As a resident of East Horsley I write to object to your target in the Draft Local Plan of at least 533 more houses in East and West Horsley, and to possible developments at the former Wisley Airfield.

Whilst a small amount of infilling in the villages may be acceptable, the sheer numbers under consideration cannot be accommodated without a massive improvement in the local infrastructure (roads and footpaths, parking, public transport, telecoms, flood prevention, schools, medical services, etc.) which would further destroy the character of these rural villages.

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

Attached documents:

Comment ID: PSLPP16/14964  Respondent: 10868513 / Tom Stevenson  Agent:

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

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

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

As a resident of East Horsley I write to object to your proposal to remove the villages of East and West Horsley from the Green Belt.

If the Borough Council had set out with the intention to destroy the character of East and West Horsley, it could not have chosen a better route than to remove the villages from the Metropolitan Green Belt.

Paragraph 86 of the National Planning Policy Framework states: “If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.”
The open character of East and West Horsley self-evidently does make an important contribution to the openness of the Green Belt. And therefore these villages must remain in the Green Belt.

Furthermore, paragraph 83 of the NPPF states that “once established, Green Belt boundaries should only be altered in exceptional circumstances”. I do not accept that your forecasts of future housing needs in the Borough, which are themselves suspect, constitute “exceptional circumstances”. Indeed, it is apparent that ministerial guidance (for example the written ministerial statement by Brandon Lewis, Parliamentary Under Secretary of State for Communities and Local Government, on 17 February 2014) supports this view.

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

Attached documents:

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**Comment ID:** PSLPA16/2789  **Respondent:** 10868609 / Robert Lockie  **Agent:**

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

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

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

I object to the proposal mentioned at a local meeting to the £1.5 million set aside proposed to be spent on Send Road over the next 10 years. What does GBC think that it actually spend the money on? The road cannot be widened as there are houses along the whole stretch of the road. At the meeting it was clear that this had not been thought out and the only proposal put forward by the GBC councillor was for traffic lights: with the massive increase of traffic, traffic lights would, at best not really help the situation and at worst would probably only enhance the problem.

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

Attached documents:

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**Comment ID:** PSLPA16/343  **Respondent:** 10868609 / Robert Lockie  **Agent:**

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

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

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

1. I object to the lack of any evidence for the alleged housing need numbers.

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

Attached documents:
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<th>Comment ID: PSLPA16/2790</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

I object to there being no transport document at the time councillors voting to put the proposed local plan out for consultation, nor at the time when the local plan was put out for consultation, not at the time of the meeting in Send (attended by GBC councillors) after the plan has been put out for consultation. Traffic surveys were said at this meeting to be taking place ‘soon’. I object to this being done at this time of year when traffic decreases as there is (1) less school traffic as GCSE and A level pupils are not attending school regularly (2) private school break up at the beginning/middle of July (3) local authority school will have broken up by 21st July (4) we are in a general holiday period when many people are away on holiday regardless of the schools. A traffic survey at this time will not be a true reflection of the general traffic situation. Most of the time it is a nightmare getting through traffic, especially in the rush hours, which can be extensive as people start to travel to work (M25 & A3) at least from 6am and in the evening until at least 7pm. Adding to this is the total standstill on our roads, often for long periods of time when there are accidents on the M25/A3 - these hold ups are most days of the week. A survey done in the summer months will only record what GBC to show – that traffic is not a problem at the moment. A traffic survey needs to be done in October or later over several days when things are really bad

I object to mention of a tunnel going under Guildford being put forward at this meeting as it is more or less a forgone conclusion that it will happen. A tunnel would need excessive funding that would have to come from Highways England. It is no good GBC saying they are going to consult with them: this should have been done BEFORE the proposed local plan was voted on and put forward for consultation. Even if this was agreed, it would take years to build and would cause massive disruption in the area. The Hindhead Tunnel cannot be used as an example as this was first proposed years and years ago and Hindhead was a bottleneck as there was only a single lane carriageway each way – The A3 already has a 3 lane carriageway

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

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<th>Comment ID: PSLPS16/5771</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

I object to the proposed development at Gosden Farm (Policy A25). This is opposite Potters lane in Send and the proposed 2000 home, travellers pitches, employment space, retail centre etc would have a serious impact on Send and its infrastructure

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

Attached documents:
**Comment ID:** PSLPS16/5772  **Respondent:** 10868609 / Robert Lockie  **Agent:**

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

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

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

- I object to the proposed development at Wisley (A35) as it would cause significant traffic flow problems through Send and Ripley and cause further congestion on an already congested A3/M25
- I object to the proposed development at Wisley (A35) as many of the proposals have been rejected by the various authorities including sewage works at Ripley could not cope with the increase, SCC has said in the past that it is not a site where they want a new school, GBC has turned many planning proposals down. We do not know and, seemingly cannot find out who the developers are other than from the Caymen Islands. With central governments crack down on offshore companies buying land etc because of money laundering, if this is then made retrospective and it is found that this is the case with this company from the Caymen Islands, what sort of mess would that leave GBC in? It would seem crazy to go ahead with this development unless the company is prepared to disclose what the investors etc are. There is a need for transparency about this company.

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

Attached documents:

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**Comment ID:** PSLPS16/5769  **Respondent:** 10868609 / Robert Lockie  **Agent:**

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

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

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

- I object to site A42a Clockbarn Nursery in Tannery Lane being used for 45 houses as there are real flooding concerns
- I object to site A42a Clockbarn Nursery in Tannery Lane being used for 45 houses as this is a narrow, twisting country lane with inadequate access and Tannery Lane could not cope with the increase of traffic. It junction with Send Road is already a hazard for vehicles trying to join the main road. Planning permission has, unfortunately, already been granted for a marina complex along Tannery Lane which will exacerbate the traffic problem at this dangerous junction and along a narrow, twisting country lane.

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

Attached documents:

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**Comment ID:** PSLPS16/5765  **Respondent:** 10868609 / Robert Lockie  **Agent:**
I object to site allocation A43, land at Garlick’s Arch, in the local plan being used for housing and industrial use: it is green belt and protected by the NPPF which prevents merger of settlements. There are NO exceptional circumstances

- I object to site allocation A43, land at Garlick’s Arch, in the local plan being used for housing and industrial use as this is a new site and was not included in the Regulation 18 draft and has not been consulted upon previously
- I object to site A43 being used for industrial use as there is no proof that it is needed and if it is needed it should be at Slyfield which is already an industrial location and where there is room to expand and where there are similar businesses. Slyfield has been turned down by GBC planning seemingly in favour of Garlick’s Arch which is a rural location.
- I object to site A43 being used for 7000sq metres of industrial space because land off the A3 slip road at Burnt Common had a proposal for industrial use and where there is already industrial use was, at the last minute, taken out of the proposed local plan.
- I object to site A43 being used for 400 houses/homes and 7000sq metres of industrial space because this land is liable to flooding, in fact the Portsmouth Road floods even with a small amount of rain. The rain drains down from Surrey Hills and the small culvert that is designed to take the flood water and the expensive work that the environment agency did about 10 years ago will not be adequate if all the proposed building is done on land at Garlick’s Arch
- I object to site A43 being used for 400 houses/homes and 7000sq metres of industrial space because this land is covered by ancient woodland and trees from 16th century would be endangered

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

Attached documents:

Comment ID: PSLPS16/5776  Respondent: 10868609 / Robert Lockie  Agent:

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

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

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

I object because 2 years ago there was planning submitted for 25 houses to be built at Burnt Common which was rejected by GBC. Now 400 homes and industrial use is proposed for the site! What is going on?

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

Attached documents:

Comment ID: PSLPS16/5773  Respondent: 10868609 / Robert Lockie  Agent:
| Comment ID: PSLPS16/5774 | Respondent: 10868609 / Robert Lockie | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a |

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

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

- I object to the 4way interchange proposed for the A3 at Burnt Common with the above problem and 2,000 houses at Wisley and 2,000 houses at Burpham, Send could not cope. Added to this is 1850 homes at Blackwell Farm which would also add to this.
- I object to the 4way interchange proposed for the A3 at Burnt Common as (added to the above) noise and pollution levels which are already at excessive levels, would be far worse.

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

Attached documents:

| Comment ID: PSLPS16/5766 | Respondent: 10868609 / Robert Lockie | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44 |

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

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

- I object to the fact that no real guarantee has will make that the proposed new junction with the A3 would be built BEFORE housing and increased industrial traffic. There is no workable proposal in the draft local plan that this would happen. The wording would give developers ways of building without this being done if planning permission in the proposed local plan was granted – they would have ways of wheedling out of road building. There is no real guarantee to councillors stating at the meeting in Send that ‘if infrastructure does not happen then housing will not happen’.
- I object to the proposed junction new A3 junction at Burnt Common as no funding has been guaranteed for this and the money for this would NOT come from GBC. At the time of the issuing of the draft proposal, significant talks had not taken place with Surrey CC/ Highway England etc so there is no guarantee they would agree to fund this and no guarantee of a time frame for funding.

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

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

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

- I object to site A44, land at Wind’s Ridge and Send Hill being used for 40 houses a 2 travellers pitches as it is an inappropriate location with narrow, single track country roads which will not have sufficient access and would spoil beautiful countryside. This is a new site and Not included in the Regulation 18 draft and has not been previously consulted on.
- I object to site A44, land at Wind’s Ridge and Send Hill being used for 40 houses a 2 travellers pitches as this land has unsafe landfill waste: this information is documented and registered with GBC

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

Attached documents:

Comment ID: PSLPP16/11694  Respondent: 10868609 / Robert Lockie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

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

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

I object to much ‘talk’ of affordable house in the proposal/meetings but what is affordable housing, affordable by whom. The area is notorious for high house prices which would probably only be affordable for people moving out of London as it is too expensive for them. The people in these ‘affordable’ house would then travel into London for work thus adding nothing to the actual housing needs of the area.

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

Attached documents:

Comment ID: PSLPP16/993  Respondent: 10868609 / Robert Lockie  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the lack of provision for new schools.
2. I object to the lack of provision for Doctors Surgeries.
3. I object to the lack of thought regarding congestion on the already congested roads.
4. I object to the lack of thought regarding general infrastructure.

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

Attached documents:

Comment ID: PSLPP16/11679  Respondent: 10868609 / Robert Lockie  Agent:

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

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

I object to the wholesale developments proposed in the local plan. With the developments proposed for Wisley (A35), Garlick’s Arch, Gosden Farm (A25) and Blackwell Farm there would be ribbon development along the A3 which would overload the surrounding area infrastructure and nature of the villages, especially as there is no firm evidence that this amount of development is needed and there IS evidence that this development is not needed.

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

Attached documents:

Comment ID: PSLPP16/11690  Respondent: 10868609 / Robert Lockie  Agent:

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

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

I object because the transport assessment for Send and the surrounding area was not available to councillors for the vote taken on 24th May (the vote to put forward the local plan for consultation) I object to the proposed developments in Send as there is no provision for school place: the merger of Send infant and junior school in Send to the new building which should be ready in December 2016 has no provision for increased numbers of children which the extensive proposed building in Send would require.

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

Attached documents:

Comment ID: PSLPP16/11691  Respondent: 10868609 / Robert Lockie  Agent:
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the proposed development in Send as there is a lack of provision for doctors and related health services. It is already a nightmare trying to get a doctor’s appointment as they are overloaded with work and even if expansion was an option to the one surgery that serves Send and Ripley, the doctors would need space and money to do this – they have not been consulted</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to the proposal for building in Send as Send Road (A247) would be gridlocked all day and Send would be a through route for traffic to Woking from the M25 to the A3. This would also have a major impact on Old Woking with its narrow roundabout and roads.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
I object to what is being proposed for roads as it is in no way definite and cannot be the way to solve the A3 problems.

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

Attached documents:

Comment ID: PSLPP16/992  Respondent: 10868609 / Robert Lockie  Agent:

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

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

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

1. I object to further erosion of the green belt.
2. I object to any villages being removed from the green belt.

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

Attached documents:

Comment ID: PSLPP16/11676  Respondent: 10868609 / Robert Lockie  Agent:

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

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

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

- I object to Send and the surrounding area being taken out of the Green Belt. It was meant to be a permanent requirement and no justifiable reason has been identified as to why this should not be continued. The Green Belt in Send stop stops Woking and Guildford becoming a conurbation.
- I object to Send and the surrounding area being taken out of the Green Belt because local councillors and central government were elected in 2015 on the clear promise of protecting the Green Belt and local councillors, most of them from the Conservative Party, are in clear breach of their election promise and going against what their own party in central government want.
- I object to Send and the surrounding area being taken out of the Green Belt because, regardless of the proposed development in the local plan, taking the area out of Green Belt will give carte blanche for development in future

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

Attached documents:
Comment ID: PSLPP16/991  Respondent: 10868609 / Robert Lockie  Agent:

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

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

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

1. I object to the disproportionate amount of development in one area of the Borough
2. I object to the limited consultation period.
3. I object to the last minute inclusion of new sites with less than two weeks notice.
4. I also object because this plan is simply not fit for purpose.

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

Attached documents:

Comment ID: PSLPP16/11682  Respondent: 10868609 / Robert Lockie  Agent:

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

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

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

I object to the disproportionate amount of development that GBC has proposed for Send and the surrounding area. Apart from the main road through Send, the rest of the village is very rural with single track country lanes, where it is already dangerous as there are virtually no footpaths in Send and traffic can speed along these lanes, particularly when the numerous traffic hold ups occur along the A3 and the village is used as a cut through (this also applies to Ripley)

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

Attached documents:

Comment ID: PSLPP16/11693  Respondent: 10868609 / Robert Lockie  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the overload of development in Send as 50% of the borough’s proposed

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

Attached documents:

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Comment ID: SQLP16/1399  Respondent: 10868609 / Robert Lockie  Agent:

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

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

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

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I object to the fact that at the GBC meeting where the vote was taken to put forward the proposed local plan for consultation, in this enormous document, there were many pages blank where ‘TBA’ was the only thing on the page and councillors were told that these would be sorted out later (or words to that effect). How can councillors, mainly Conservatives, vote for a proposed plan to be put forward when they did not have full facts at their disposal?

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

Attached documents:

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Comment ID: SQLP16/1400  Respondent: 10868609 / Robert Lockie  Agent:

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

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

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

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• I object to the lack of evidence that Guilford has a need for the housing numbers proposed and that information about how GBC reached this conclusion is not transparent and the even borough councillors have been refused this information. What on earth is going on that it has to be so secret?
• I object that, along the same lines as above the 2015 SHMA assessment should be called into question. The use of numbers of foreign students has been used to add to housing needs and therefore inflates the number of houses needed. If the population is to grow by the amount predicted then only approximately 8000 homes will be needed and not 13860
• I object because, given the above figure of approximately 8000 homes needed 50% of these could be built on brownfield sites
• I object to the lack of sound evidence for expansion given that the ENLA assessment 2015 shows an 80% reduction in employment space from the previous ENLA of 2013: therefore industrial space at Burnt Common would not be needed
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1398  Respondent: 10868609 / Robert Lockie  Agent:

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

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

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

I wish to raise numerous objections to the proposed GBC local plan as follows (and I request that my comments be shown to the planning inspector):

I object to the last minute inclusion of new sites into the local plan with less than 2 weeks notice

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

Attached documents:

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Comment ID: SQLP16/1401  Respondent: 10868609 / Robert Lockie  Agent:

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

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

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

- I object to the fact that GBC does not seem to have followed correct process in its dealings over the local plan. Since 2014 GBC has changed ever major site in Send proposed for development. In 2014 the proposal was for 430 houses and went down to 185 in April 2016; now it has gone up again to 485: this would need another full consultation under Regulation 18 and not the short cut of Regulation 19 which is what GBC is trying to do. It stabs at total incompetence and this and other anomalies makes me wonder exactly what GBC secret agenda is!
- I object to the fact that GBC has not bothered to challenge central government about the proposed need for housing etc that it has put forward for our area. Local authorities are allowed to apply ‘constraints’ to the number because of factors like Green Belt and infrastructure issues
- I object to the limited consultation period, especially as it has occurred in the summer months when people are away on holiday

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: SQLP16/1403  Respondent: 10868609 / Robert Lockie  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

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

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

I object to the local plan because I do not feel that GBC knows what it is doing. At a meeting in Send after the proposed local plan had been released Councillor Spooner said (and I quote) ‘We are all here in a mess in this borough.’

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

Attached documents:

Comment ID: pslp172/1354  Respondent: 10868609 / Robert Lockie  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

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

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

1. Having lived in the area for 36 years, I feel that these changes to the plan is disproportionate and out of keeping with the historical nature of this area.
2. There is no evidence that 6 Travelling Showpeople plots would enhance the life of the local community.
3. The inclusion of 6 Travelling Showpeople plots is contentious in its application as it would result in the area being overdeveloped.
4. I object to the inclusion of 6 Travelling Showpeople plots in an area which currently enjoys ‘Green Belt’ status.
5. There is no evidence of a need for 6 Travelling Showpeople plots. The clauses relating to the possibility of these plots being used for other development in the event of insufficient interest is indicative of lack of evidence.

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

Attached documents:
Comment ID: PSLPA16/514  Respondent: 10868737 / P Molesworth  Agent:

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

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

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

I am writing to object to the proposed plan affecting the Send and Send Marsh Areas:

Plans A42, A43 and A44: The village of Send and Send march have limited access, and no public transport which can be relied on for travel to employment. Therefore the creation of new homes within these areas will dramatically affect the already congested road network. It is noted that under the plan A43A there are new slip roads for the A3, and this is supported, however this will not by anyway relive the existing problem. The fact is during the rush hour periods and frequently on the weekends the A3 is congested from around the BP services to the M25. All new homes will still be served by the existing North bound slip at Ripley as it will take commuters closer to the M25. In fact it may encourage more of the existing A3 north bound traffic to travel through the over used village roads.

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

Attached documents:

Comment ID: PSLPS16/714  Respondent: 10868737 / P Molesworth  Agent:

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

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

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

I object to the statement under A43 that there is a stated opportunity that this will improve bus frequency and encourage travel to and from the site. It is hard to understand how the development of the number of houses proposed will in fact change the current occasional bus service to sufficiently reliable and frequent but service that can be relied upon for travel to and from employment.

I object under A43 the opportunity to reduce the flood risk. Any development will increase the risk both locally and in the area in general. All surface water drains to the Wey navigation which frequently overflows during periods of high rainfall and development put increased pressure on this.

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

Attached documents:

Comment ID: PSLPS16/2901  Respondent: 10868737 / P Molesworth  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

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

Attached documents:

Comment ID: PSLPS16/715  Respondent: 10868737 / P Molesworth  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

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

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

I object to A44 the development of the area west of Send Hill Road which is not suitable to take increased traffic, it is not wide enough for two lanes of traffic as is evident by the lack of the middle white line. South of Send Hill is Potters lane which is already over used and is a frequent road with incidents where cars coming of the A3 cut through maintaining the speed they where traveling on the A3 and soon getting to the small number of houses and the blind corner where they meet an oncoming vehicle on a lane wide enough for a single car only. This is made worse in the winter months where the particular area is prone to flooding and the formation of ice frequently.

Further objection under A44 is that this is currently Green Belt and has an existing abundance of plant and wild life, this development will destroy this area with little or no regards to the eco system! The plan states “Green corridors and linkages to habitats outside of the site” where as in fact the plan removes the eco system habitats so hardly a linkage. The green belt beyond the site is predominantly farm land and not natural habitat.

I also object under A44 that requires “Sensitive design at site boundaries that has significant regard to the transition from village to greenfield” this only affects the boundary development whereas as the complete development will not be in
keeping with the existing Village. As I personally have been rejected twice a conversion on my home for this very fact despite general support from the majority of my neighbours.

Under A44 there is a stated evidence of a quarry, but no mention that this was actually more recently used as a land fill, including the disposal of Asbestos! Therefore what precautions are taken into account for this? Development on a previous landfill should be considered very carefully. I understand that the area has been monitored recently and considered safe, however a major development would drastically affect this.

Also the area under A44 one of the few areas locally for dog walking with access both via Send Hill and a foot path to the village, developing this will remove one of the few remaining places people within send can let their dog roam free.

Finally I object to the large scale removal of green belt area which appears to be a back door approach to further development without considering the impacts specifically for the proposed development at the time.

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

**Attached documents:**

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

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<th>PSLPA16/973</th>
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<th>10868769 / Don Drew</th>
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I want to register my strong disagreement to the planned developments around the Send area. In particular:

I object to the planned construction of 400 houses and 7000 square metres of industrial space at Garlick's Arch. This would destroy ancient woodland and completely alter the nature of Send and Ripley villages to become one big strip development. Send Road and Sendmarsh Road, as well as Polesden Lane, are already extremely busy roads with traffic jams and queues on many mornings, particularly during term time. Traffic flows would be hugely increases as a result of such a housing development and the industrial development would increase the flow of large lorries which are already having to mount pavement on Sendmarsh Road to pass one another. There would be danger to pedestrians and from traffic based pollution.

I object to a new interchange with the A3 at Burnt Common. This would send much more traffic which currently bypasses Ripley village through narrow roads, particularly Polesden Lane, which is partially single track and already a nightmare to traverse.

I object to Ripley and Send being removed from the Green Belt. This area of Green Belt prevents the joining up of Guildford and Woking and is against the principles agreed by local councillors and central government to protect the Green Belt. The rash of new development being now discussed would just be the beginning.

Please ensure that my objections are relayed to the relevant Planning Officer, and please also confirm receipt of this communication.

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

Attached documents:

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Comment ID: pslp172/1665  Respondent: 10868769 / Don Drew  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

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

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

I object to Local Plan Policy A58 because there is no need to build on Green Belt land when there is clearly industrial space available in the local area. The road and traffic situation in the area of the proposed development is already congested and the increase in HGV traffic will only cause further problems. I also object to the infilling of areas between villages via the use of Green Belt land.

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

Attached documents:

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Comment ID: PSLPS16/3835  Respondent: 10868897 / Paul Brown  Agent:

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

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the draft Local Plan for the following reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. The geography of London is unique specifically because of the existence of the Green Belt; if not for the Green Belt London would sprawl uncontrollably like so many other cities in the world.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5. I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

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

7. I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPI) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.
I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

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

Attached documents:

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Comment ID: PSLPS16/5925  Respondent: 10868929 / Angela Wood  Agent:

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

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

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

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

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

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

Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

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

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

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

Attached documents:

---

Comment ID: PSLPP16/77  Respondent: 10869025 / E.J. Bartlett  Agent:

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

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

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

I OBJECT TO THE 2016 DRAFT LOCAL PLAN

• I object to any erosion of the Green Belt. The Green Belt exists for a reason - to protect the countryside. Once the Green Belt has been lost, it is gone forever
• I object to any ‘in-setting’ (i.e. removal) of any villages from the Green Belt

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

Attached documents:

Comment ID: PSLPP16/78  Respondent: 10869025 / E.J. Bartlett  Agent:

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

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

- I object to development in this area when there are clearly no services or infrastructure to support more housing
- I object to development which causes more traffic on already over-loaded roads. The A3 and M25 are frequently at capacity already. Building at Wisley Airfield and at Garlick's Arch will result in far more cars on the roads as there are no railway stations at these locations and rural bus services have been reduced
- I object to development which causes more traffic on small country roads. The narrow country roads around Ripley, Clandon and Wisley are places for walkers, cyclists and horse riders. They are becoming increasingly congested and therefore dangerous for these users
- I object to development which will cause more traffic in small villages such as Wisley, Clandon and Ripley. Parking is already difficult in these places and will only get worse if there is more development
- I object to more development which will reduce people's quality of life in terms of pollution, congestion on roads, difficulty parking and increased density of population

*We all need space; unless we have it we cannot reach that sense of quiet in which whispers of better things come to us gently. Our lives in London are over-crowded, over-excited, over-strained. This is true of all classes; we all want quiet; we all want beauty for the refreshment of our souls. Sometimes we think of it as a luxury, but when God made the world, He made it very beautiful, and meant that we should live amongst its beauties, and that they should speak peace to us in our daily lives.*

*Octavia Hill (National Trust founder)*

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

Attached documents:

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I object to the proposal to inset Send Business Park from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

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

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

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

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

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location. For example, it is the furthest from railway stations.
2. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10).
3. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc).
4. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
5. Increased traffic in the area will make small country lanes even more dangerous to walkers, horse riders and cyclists.
6. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   - The associated traffic increase from the RHS has not been taken into account.
   - The regular events at the RHS which attract 1000s more visitors several times a year and the resultant traffic has not been taken into account.
7. There is insufficient employment available onsite so that almost all residents will have to travel to work. This will seriously add to the congestion on local roads.
8. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
9. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16).
10. I object to the removal of additional 3.1 ha from the green belt without any justification.
11. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.
12. I object to para 21 which “limits” development in flood zone 2 and 3: development should be excluded in flood zone 2 and 3.
13. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
14. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
15. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.
16. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

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

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

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

I object to Clockbarn Nursery, Tannery Lane, Policy A42 because:

- The increase to 60 homes in place of 45 homes is 33% more and too much especially given all the previous objections
- It will worsen traffic problems in Tannery Lane and at the A247 junction
- The Breen belt should be protected with NO exceptions
- It will make surface water flooding, which is already bad, even worse

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

Attached documents:

Comment ID: pslp172/1882  Respondent: 10869025 / E.J. Bartlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

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

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

I object to the Policy A43 change at Garlick’s Arch because:

- It is beautiful permanent Green Belt and no 'exceptional circumstances' exist
- It will damage ancient woodland that existed at the time of Elizabeth 1
- It will join up Ripley and Send and defeat the key purpose of Green Belt
- It is subject to frequent flooding and is currently a flood zone 2 allocation
- It will generate excessive traffic that will block up the already congested local roads of Send and Ripley

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

Attached documents:

Comment ID: pslp172/1883  Respondent: 10869025 / E.J. Bartlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy A 58 at Burnt Common because:

- It was deleted from the 2014 draft because of all the objections made previously
- There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt
- The impact on small surrounding roads will create traffic gridlock
- It will join up existing villages and defeat the purpose of the Green Belt

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

Attached documents:

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Comment ID: PSLPS16/152  Respondent: 10869345 / Richard Vickery  Agent:

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

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

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

I OBJECT strongly to this attack on the use of the Green belt in this New local Plan, which has Just been thrust upon the residents of this area of Send, Send Marsh and Burnt Common.

This New Plan is a real assault on this area which, on the previous Plan, was designated about 45 or so houses placed on it, now we Suddenly told you intend to build 400 Houses plus an Industrial Development On precious Green Belt Land, Outrageous!!

This development Is totally Inappropriate and unnecessary, and will devastate the Village together with Ripley which we have lived in for thirty five years.

The amount of extra traffic that will be generated by the 400 houses Plus the new Interchange will overwhelm us all. At present it is Intolerable at certain times of the day. This will Just add to Total Gridlock, with traffic using this village as a cut through from the A3 to Woking.

The infrasructure within the village is overburdened now, let alone what will happen when this plan is ever adopted. The Roads are full, the schools are Full, and the Health Centre is overflowing especially as it now is responsible for Ripley residents also.

As a council you have a responsibility to look after your residents in rural villages, maintaining a certain Quality of Life for us all

This Plan is really Flawed and I therefore OBJECT to it. please submit this to the Inspector,

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

Attached documents:
Comment ID: pslp172/609  Respondent: 10869345 / Richard Vickery  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

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

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

I feel it most necessary to write to you again to object to the various proposed increases in the new draft Local Plan 2017 for Send Ward.

Policy A42 Tannery Lane:

I object to the increase of 33% in homes for this area of Send as it will put an excessive burden on the road access onto Send Road (the main road through Send) which is already overloaded at present, especially from Burnt Common to Old Woking.

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

Attached documents:

Comment ID: pslp172/610  Respondent: 10869345 / Richard Vickery  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

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

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

Policy A43 Land at Garlick's Arch

Yet again you have ignored the many objections from both Ripley and Send. My main objection is to building on this protected area in the green belt (which is appalling for a Tory council to consider ), in addition to which, it is not suitable anyway with its flooding potential and contaminated ground. Again the road structure around will not cope with the additional cars as it doesn't now. The need for Travellers and Showpeople plots are not at all warranted as you have already allocated some in the Send Hill area.

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

Attached documents:

Comment ID: pslp172/611  Respondent: 10869345 / Richard Vickery  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58
Policy A58

I object to the changed proposal for a minimum 7000 square m of floor space instead of the original 2016 plan for a maximum amount of spaces, thus allowing for further development in the future. This development is quite unnecessary in the middle of a green belt area especially as nearby Slyfield industrial estate is not fully utilised.

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

Attached documents:

Comment ID: PSLPA16/4181  Respondent: 10869441 / Chris & Louise Dorman  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

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

Where are the SPECIFIC and realistic plans to deal with the A3? There doesn't seem to be any real concrete plans but only 'aspirational' ones. If you have ever driven on the A3 you will know exactly how often it is traffic logged, frequently dogged with accidents and I have personal experience of sitting in traffic every single journey to collect my child from school. How is creating a new village next to it and building more houses in the neighbouring villages of Horsley, Clandon, Ripley and Send etc going to help ease congestion and reduce carbon emissions in line with national policy? How does this improve the lives of people living in these areas? They are being encircled with concrete.

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

Attached documents:

Comment ID: PSLPA16/4180  Respondent: 10869441 / Chris & Louise Dorman  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am emailing to object to the proposed local plan which is open for consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 until today.

In the Sustainability Appraisal of the local plan (June 2016) at paragraph 3.1.3 it states that 'The Local Plan seeks alignment with the Council's Corporate Plan 2015-20, which establishes the ambition for Guildford to be a 'town and rural borough that is the most desirable place to live, work and visit in the South East England.' The Corporate Plan goes on to explain that:

'We want Guildford to be a centre for education, healthcare ........ a county town set in a vibrant rural environment which balances the needs of urban and rural communities alike ..........and with infrastructure that will properly cope with our needs.'

I would argue that the rural borough will no longer be rural if the proposed development of housing goes ahead and that the need of those already living in the borough's rural villages won't be balanced because of the erosion of the green belt and the increase in concrete, pollution, congestion on the roads, pressure on our already full schools and GP surgeries, sewage and water supplies. The impact on heritage sites in and around the Horsleys and the impact on our environment which is beautiful and rural will inevitably be negative. The precise details on infrastructure which will 'properly cope with our needs' appear vague amongst the reams of documentation and any infrastructure needs to be funded. How exactly (taking away whatever possible developers have to contribute) will this be funded and indeed actually met?

The plan has to be considered for legal compliance, soundness and duty to co-operate.

The plan is obviously detailed and refers to evidence. The problem with population projection etc as evidence is that it is not hard evidence but just possibilities. A major national referendum regarding leaving the EU has taken place SINCE this plan was published and open for consultation and surely evidence must be sought regarding the need for housing, planning, migration, population movement and growth in light of this major decision? The NPPF requires the development plan to be based on up to date evidence.

With regard to soundness, the plan has to be positively prepared, justified and effective. There is a presumption in favour of sustainable development. I don't believe that the proposals are fully sustainable and not convinced that they are justified. The SA report (referred to above) refers to concerns from Elmbridge regarding the proposed Wisley site ' We query whether this is the right location for this scale of growth. The fundamental aim of the Metropolitan Green Belt is ultimately to prevent the spread of London. This site is located in the very north (east) of the borough where the Green Belt is already fragmented and particularly vulnerable to additional development, a point noted by the Inspector for the examination into our Core Strategy. Further evidence should be provided to indicate why this site has been identified in preference to other sites having regard to the strategic significance of the Green Belt in this location.' (page 23/145) of the SA report.

The proposed site at Wisley for 2,000 homes is already flagged up with issues such as pollution and climate change, already heavy congestion on the A3, biodiversity etc. The SA report also refers to a 'strong commitment to deliver a new GP surgery as part of the scheme ...' And then much more vaguely and worryingly refers to residents who 'would also be with c.3-3.5km of a surgery at East Horsley (understood to have capacity to expand)'

Is a strong commitment enough or does it just mean that it may happen and that more pressure will be actually placed on the East Horsley surgery? Where is the evidence to support the statement that the East Horsley GP surgery has capacity to expand? It would only serve to put more pressure on an infrastructure that doesn't need any more.

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

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

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

I also object to the erosion of the green belt and the proposal to remove the Horsleys from it. The exceptional circumstances required to do so have not been adequately shown. The primary school is full and there is no specific plan to deal with the effect on that. The roads are already in need of constant maintenance from usage, pot holes, problems with flooding causing erosion of the road surface and more housing and increasing the population will not only put excessive pressure on our roads, schools, sewage and water systems but also increase pollution. It will erode the special characteristics of the Lovelace villages and we must protect and respect their proximity to National Trust Properties and land, to West Horsley Place (of historic interest) and to Horsley Towers and maintain the beautiful countryside and biodiversity of the nature living in it.

I also support the views of the Horsley Countryside Preservation Society and I object to the local plan for the reasons stated above. The proposals for 593 houses in the Horsleys, the creation of Wisley Village, development around Ripley, Ockham etc would seriously impact the current residents lives and is an area which should remain protected by the green belt for future generations because of its openess and historical value.

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

Attached documents:

Comment ID: PSLP16/17186  Respondent: 10869441 / Chris & Louise Dorman  Agent:

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

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

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

Planning policies should aim to be sustainable (I would argue that the SA report itself highlights many reasons why the proposed developments cause valid concerns) and that the Council has a duty to cooperate with everyone who is potentially affected by this plan to address all concerns and to put forward a balanced representation of opinions. The video on the website only shows those in favour and therefore is not balanced. There is reference to improving the A3 in the video but no specific mention at all of what is planned and then swiftly moves to the train network.

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

Attached documents:

Comment ID: PSLPA16/296  Respondent: 10869633 / John & Jacquie Sharman  Agent:

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

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

I write to object to the local plan:

I object to the six development sites in East Horsley and West Horsley; I object to taking East and West Horsley out of the green belt; and I object to the planned development of Wisley airfield.

All of the above will result in increased pollution, strain on local infrastructure and fundamentally change the nature of this area.

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

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPA16/75</th>
<th>Respondent:</th>
<th>10869633 / John &amp; Jacquie Sharman</th>
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</table>

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

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

I am writing to save the character of our Horsley village from future development.

I do not think the village areas should be removed from the Green Belt.

I am objecting to the building of a further 533 new houses in The Horsleys.

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

Attached documents:

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<th>Comment ID:</th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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</table>

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am also objecting to the development of Wisley airfield.

I believe that the developments would create very congested roads. There would be too much pressure on services such as the medical centre. There would not be enough car parking spaces at the station or shops. There would be greater risk of flooding. There would be much higher levels of pollution. There would be a lack of school places in the area. Finally it would be dreadful to destroy our beautiful countryside.

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

Attached documents:

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I object to the proposals A42, A43 and A44 for a total of 485 homes and 2 travellers pitches in Send on the following grounds:

1. The increased housing will bring with it at least 1-2 cars per household which will add further traffic to the small village roads particularly at peak times. These roads already struggle to cope with current traffic levels.
2. Like much of Surrey the roads around Send are in a poor state and the increased traffic in the area will only add to their deterioration.
3. The increase in population of Send will impact on services such as the Villages Medical Centre where it is already difficult to arrange appointments with the Doctors.
4. There is no need whatsoever for industrial developments in Send as raised in A43. Send is not and never will be the right location for industrial premises being a rural village.

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

Attached documents:

---

I object to the proposals A42, A43 and A44 for a total of 485 homes and 2 travellers pitches in Send on the following grounds:

1. The increased housing will bring with it at least 1-2 cars per household which will add further traffic to the small village roads particularly at peak times. These roads already struggle to cope with current traffic levels.
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4. There is no need whatsoever for industrial developments in Send as raised in A43. Send is not and never will be the right location for industrial premises being a rural village.

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

Attached documents:
I object to the proposals A42, A43 and A44 for a total of 485 homes and 2 travellers pitches in Send on the following grounds:

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4. There is no need whatsoever for industrial developments in Send as raised in A43. Send is not and never will be the right location for industrial premises being a rural village.

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

Attached documents:

---

I also strongly object to the ridiculous proposal (A43a) of a new on/off slip road for the A3 at Burnt Common on a number of grounds:

1. The destruction of Green Belt land this proposal will use; including mature Oak woodland which is important for local wildlife.
2. The fact that the north-bound access will join an already busy section of the A3 particularly during the rush hour, with the potential of an increased risk of accidents as the traffic joins the A3 flow.
3. Access from Send Marsh Road to the B2215 can be difficult enough during peak times as traffic comes off the A3 using the B2215 as a ‘rat run’ to re-join the A3 at Ripley.
4. The A3 corridor is such a busy route already so further development anywhere along its length is a ridiculous proposal.

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

Attached documents:

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Comment ID: PSLPS16/6636  Respondent: 10869729 / Ralph Clark  Agent:

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

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

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

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Comment ID: PSLPS16/8247  Respondent: 10869729 / Ralph Clark  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposals A42, A43 and A44 for a total of 485 homes and 2 travellers pitches in Send on the following grounds:

1. The increased housing will bring with it at least 1-2 cars per household which will add further traffic to the small village roads particularly at peak times. These roads already struggle to cope with current traffic levels.
2. Like much of Surrey the roads around Send are in a poor state and the increased traffic in the area will only add to their deterioration.
3. The increase in population of Send will impact on services such as the Villages Medical Centre where it is already difficult to arrange appointments with the Doctors.
4. There is no need whatsoever for industrial developments in Send as raised in A43. Send is not and never will be the right location for industrial premises being a rural village.

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

Attached documents:

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<th>Respondent: 10869729 / Ralph Clark</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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Objections to the Guildford Borough Council Proposed Submission Local Plan (June 2016)

I am writing to Guildford Borough Council to object to the Council’s ill-conceived Draft Local Plan in relation to the proposed developments in the village of Send as listed below. I believe that this plan is not in compliance with the regulations with which it is required to comply.

<table>
<thead>
<tr>
<th>Proposal</th>
<th>Location</th>
<th>Type</th>
<th>Quantity</th>
</tr>
</thead>
<tbody>
<tr>
<td>A42</td>
<td>Clockbarn Nursery, Tannery Lane, Send</td>
<td>Send Homes (C3)</td>
<td>45</td>
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<tr>
<td>A43</td>
<td>Land at Garlick's Arch, Send Marsh Burnt Common and Ripley</td>
<td>Send and Lovelace Homes (C3) and employment floorspace (B1c, B2, B8)</td>
<td>400</td>
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<tr>
<td>A43a</td>
<td>Land for new north facing slip roads to/ from A3 at Send Marsh/ Burnt Common</td>
<td>Send and Clandon and Horsley new northbound on-slip to the A3 trunk road from A247 Clandon Road and a new southbound off-slip from the A3 trunk road to A247 Clandon Road</td>
<td></td>
</tr>
<tr>
<td>A44</td>
<td>Land west of Winds Ridge and Send Hill, Send</td>
<td>Send Homes (C3) and traveller pitches (sui generis)</td>
<td>40</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/1466</th>
<th>Respondent: 10869857 / A.C. Smith</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

I object to Policy A43 (Land at Garlick’s Arch). The proposal is for up to 7,000 square metres of industrial and other employment space and 400 dwellings. The industrial space is simply not required, since the latest Employment Land Needs Assessment 2015 shows a reduction of 80% in required employment floor space compared with the 2014 Draft Local Plan. New industrial space if required can be accommodated at Slyfield, and it is quite unnecessary to site it at Garlick’s Arch. Furthermore, the additional traffic generated by so much employment space, coupled with the traffic generated by the 400 new dwellings and Policy 43A (new A3 intersection at Burnt Common), would overwhelm the local road network. In particular the A247, through Send to Old Woking, is likely to become completely gridlocked for much of the day, with potential serious consequences in terms of noise and air pollution, physical danger etc. for people whose houses front on Send road, as well as serious inconvenience to other people in the area. It has to be appreciated that Send Road ends at a roundabout in Old Woking where it debouches into narrow winding streets. There is no scope for increasing traffic capacity through these streets, which are already heavily congested at certain times. The proposals for Gosden Hill Farm and Wisley Airfield will only further exacerbate the traffic problem. Furthermore, the additional local population from the 400 new dwellings at Garlick’s Arch cannot be accommodated by the existing infrastructure of schools, medical services etc.

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

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<th>Comment ID: PSLPS16/1467</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to Policy A44 (Land west of Winds Ridge and Send Hill) on a number of grounds:

(a) Send Hill is a narrow road, particularly at its southern end, with a lot of cars parked on it at various times of the day, and will be put under considerable strain by the traffic generated by the additional homes. In addition, it and the other small local roads, Vicarage lane, Potters Lane and Woodhill, are quite unsuited to large traveller caravans. The site is simply the wrong place for travellers’ pitches. A far more suitable site for travellers’ pitches, with easy access off the A3, is the triangle of land between the A3 and London Road, the B2215, which was included in the 2014 draft of the Local Plan for industrial development and has now been abandoned in favour of Garlick’s Arch.

(b) The development 40 houses on this site is excessive and disproportionate compared with the density of development in the surrounding area.

(c) The site’s history as landfill makes it unsuitable for residential development.

(d) No justification has been put forward for including travellers’ pitches in this site, and there is no logic for it. Elsewhere in the Draft Local Plan, where travellers’ pitches are included in sites designated for ordinary residential development, e.g. at Gosden Hill farm and Wisley Airfield, a guideline of 2 travellers’ pitches per 500 dwellings is adhered to. There is no rationale, in relation to Send Hill/Winds Ridge, for departing from that guideline and including 2 travellers’ pitches in a development of only 40 dwellings.

I am sending this letter by e-mail and post.

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

Attached documents:

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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1. I object to Policy P2. It is wrong in principle to remove Send from the Green Belt. The Send area provides a rural buffer separating the major urban areas of Guildford and Woking. Removal of Send from the Green Belt risks effectively linking Guildford to Woking through a virtually complete developed strip through Send and thus effectively turning them into a single huge conurbation of the type we already see further west in the Farnborough/Aldershot/Ash area. I object to Policy A25 (Gosden Hill Farm) for this reason: stretching along the A3 from Burpham/Merrow to a point well beyond the end of Potters Lane in Send, it is the first step in this process.

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

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Objections to Draft Local Plan

I wish to object to a number of the policies set out in the Draft Local Plan, as follows:

1. Generally, I object to the process being followed. Since the 2014 consultation, Guildford Borough Council have altered every major site in the Send area proposed for future development, and in particular have included in the latest Draft Plan sites for development which have never been mentioned before, particularly Policies A43, A43a and A44. These changes are of such significance that a full consultation under Regulation 18 is required.

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

Attached documents:

Comment ID: PSLPS16/1943  Respondent: 10869921 / Kate Haskins  Agent:

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

I object to the proposed development at Clockbarn Nursery. Tannery Lane is narrow, with poor access, and the junction with the A247 is already a bottleneck. Another 45 residences will create chaos and is simply inappropriate. The apartments proposed for further down this pretty lane, used by walkers, children on bikes and other cyclists, simply cannot be adequately accessed via the one track lane. Widening this lane will destroy footpaths and farmland. More concrete, less nature. I am pretty sure that’s not what anyone voted for.

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

Attached documents:

Comment ID: PSLPS16/1945  Respondent: 10869921 / Kate Haskins  Agent:

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

I object to the proposed development at Clockbarn Nursery. Tannery Lane is narrow, with poor access, and the junction with the A247 is already a bottleneck. Another 45 residences will create chaos and is simply inappropriate. The apartments proposed for further down this pretty lane, used by walkers, children on bikes and other cyclists, simply cannot be adequately accessed via the one track lane. Widening this lane will destroy footpaths and farmland. More concrete, less nature. I am pretty sure that’s not what anyone voted for.

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

Attached documents:
I further object to the Garlick’s Arch development. 400 homes and large industrial space will create not only a crowded, unpleasant living environment, but traffic meltdown. Clearly, nobody in the local planning department is local at all, as if they were, they would already be stuck in very high volume traffic on a daily basis, and know that this huge development will bring us all to a standstill. Don’t be fooled that an additional access point to the A3 will ease this, quite the opposite, drivers will simply join the queue in a different place, and queue back onto the local roads too. I therefore also object to the new interchange, that will simply add more queues to the existing ones, not ease any congestion at all.

I have made each of my objections clear, and I hope that those I elected to represent my family and I will listen carefully to the explicit and grave concerns voiced by a whole community. Should this development go ahead regardless, it will be a very sad day for democracy.

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

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

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

For similar reasons, I also object to the proposed development on Send Hill, a narrow, quiet lane already under strain during school pick up times. Increasing traffic volumes and adding further development will add yet more congestion to another quiet, peaceful residential area.

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

Attached documents:

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

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

I am writing to you to make my strong objections known to the latest planning proposals that will destroy the quality of life for my family and others living in Send and Ripley. Over the last months and even years, I am stunned at the level of development that is being proposed by the very people who are meant to represent the lives and families in their boroughs. I will make my latest objections clear one by one.

Firstly, I object to Send and Ripley being removed from the Green Belt. Whilst I am sure that our villages being in the greenbelt is very tiresome for local planners who otherwise have to stand up to central government, not to mention
developers offering money to build extraordinary levels of housing in our local communities, the green belt’s purpose was intended to be permanent and there is absolutely no justification for abandoning it. Quality of life for those already living in the greenbelt will be destroyed and the levels and density of housing will create the kind of unrest that has been seen time and time again when excessive development is victorious over sensible levels of planning with adequate investment in supporting facilities. I am sure that local councillors don’t need reminding that they are elected to represent their local constituents, of which they are doing a very poor job. Clear election promises have been broken. Have those running the borough lost all sight of their role and purpose?

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

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

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

Clockbarn Nursery, Tannery Lane (Policy A42)
- The number of homes has been increased by 33% on the previous plan, ignoring all concerns raised about traffic and safety issues with the congested A247 junction
- Erosion of the green belt, along with associated declines in quality of life for current residents and visitors to the Wey Navigation

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

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

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

Land at Burnt Common, London Road (Policy A58)
- This was deleted from the 2014 draft, why is it back again? It would be a pleasant surprise if the deletion of a proposal on the grounds of local objections could be proof that someone somewhere in the planning department is listening to local voices
- A change of wording from “maximum” to “minimum” shows another expansion of the plan. Supply currently outstrips demand for industrial units in current industrial areas such as Slyfield, so there is no justification to destroy green belt land to create more supply.

- The impact on local roads, already over congested, will once again, be negative.

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

Attached documents:

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**Comment ID:** pslp17q/23  **Respondent:** 10869921 / Kate Haskins  **Agent:**

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

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

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

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I am writing to you to raise my objections to the new draft local plan. I have objected to each draft so far, and I am both disappointed and angered by the fact that my objections, along with the thousands of others, have been ignored. Furthermore, the plan has been added to in terms of the quantity of houses and development in the plan. How can this be justified? Where is any evidence that the community that you are supposedly “consulting with” has in any way been listened to?

I sincerely hope that on this occasion the Guildford Planning Department respond and take into account local objections. I am sure I am not alone in believing that local government should serve its local community and borough as its first priority. There is little evidence in the local plan that this is the case. I sincerely hope that the final local plan shows proper consideration and response to local feedback.

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

Attached documents:

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**Comment ID:** PSLPS16/3544  **Respondent:** 10869985 / Alan Blackburn  **Agent:**

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

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

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

I object to building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.

Burnt Common / Garlick's Arch

I object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the (A247) would be gridlocked all day.

I object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25.

I object to the development at Garlick’s Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks’ notice and without any prior consultation and is not required in terms of housing need either for the village or the borough.

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

I object to the development at Garlick’s Arch because the site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The site is also subject to flooding.

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

Attached documents:

Comment ID: PSLPS16/3546  Respondent: 10869985 / Alan Blackburn  Agent:

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

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

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

Interchange with the A3 at Burnt Common

I object to a new interchange with the A3 at Burnt Common because Send would then have the traffic from 2000 houses at Wisley Airfield, 2000 houses at Gosden Hill and 1850 at Blackwell Farm.

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

Attached documents:

Comment ID: PSLPS16/3542  Respondent: 10869985 / Alan Blackburn  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

Firstly I should like to state that I am appalled that after my objection over two years ago (one of 20,000). I should have to repeat the process. I consider the process now to be totally undemocratic and I now have no faith at all in local and national government.

All consideration: of Green Belt; infrastructure issues; insufficient school places; road access.

I live in Orchard Way and access is very difficult one might say almost impossible currently when schools are opening and closing.

The proposed development of houses and travellers site are ludicrous considering the narrowness of Send Hill. The loss of Green Belt is a disgrace especially when it was pledged to maintain it.

I took nearly ten minutes to get from Orchard Way to Send Surgery because of the school run and parked cars which are permanently there.

This would be much worse if the Send Hill developments go ahead.

The infrastructure; Schools, parking access, doctor's surgery and access for fire engines does not figure in the plan.

**Send Hill**

I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

I object to the proposal in the local plan on the grounds that the site is not large enough for the proposed use.

I object to the proposal in the local plan on the grounds that it would cause adverse impact on street parking.

I object to the proposal in the local plan on the grounds that Send Hill is a single track country road and too narrow to provide sufficient access to the site or accommodate the potential new levels of traffic the proposed development would bring.

I object to the proposal in the local plan on the grounds that Send is in green belt. The proposed inset is inappropriate due to its permanent green belt status.

I object to the proposal in the local plan on the grounds that Send Hill is a narrow road result in loss of a turning point for vehicles.

I object to the proposal in the local plan on the grounds that it would impact the nature reserve nearby. The proposed site is a quality green belt amenity area within countryside and would be spoilt by development.

I object to the proposal in the local plan on the grounds that the existing road and parking infrastructure is already inadequate or under pressure and could worsen with the planned development, reducing quality of life.

I object to the proposal in the local plan on the grounds that too many houses are proposed to Send/Send Marsh are and the impact on traffic congestion and local services would be unacceptable.
I object to the proposal in the local plan on the grounds that the proposed number of houses potentially could result in 92 extra cars in Send Hill which is already suffering from congestion particularly at school run time.

I object to the proposal in the local plan on the grounds that this would cause loss of village identity, be detrimental to the community and increased flood risk.

I object to the proposal in the local plan on the grounds that a Wasteland Solutions environmental report on Send Hill dated March 2004 gave evidence of past ponding of water in the excavated area. Further development would disturb water table and increase risk of flooding to my property.

I object to the proposal in the local plan on the grounds that the proposed development site (A44) was used as GBC registered landfill site, not a quarry as listed as reference LLA 2081 in the local plan.

I object to the proposal in the local plan on the grounds that the 1963-8 Ordnance Survey maps of proposed site mark it as “refuse and slag heap”. It is therefore unsuitable for such a development on health reasons.

I object to the proposal in the local plan on the grounds that the 1971 Ordnance Survey maps of proposed site mark it as “refuse tip” prior to when proper licensing/registration was required. The date of the landfill works predates the 1999 EU Landfill Directive regulations. I therefore believe that there is a danger that any disturbance would be health hazard due to the unknown materials.

GBC has installed gas monitoring wells on site since July 2000. One well recording methane gas discharge.

I object to the proposal in the local plan on the grounds that a Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005-Identifies the proposed site as GBC recorded landfill site Ref GU/11/LLC with type of waste not identified. The date of the landfill works predates the 1999 EU Landfill Directive regulations. I therefore believe that there is a danger that any disturbance would be health hazard due to the unknown materials.

I object to the proposal in the local plan on the grounds that a Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005-Identifies proposed site GBC recorded landfill site Ref GU/12 with type of waste identified as “unrestricted”. This causes me concern as to what it does contain and dangers if disturbed.

I object to the proposal in the local plan on the grounds that both the Envirosearch Report RS1100201_1_1 dated 17th February 2004 and historical map data and information from GBC has identified site as landfill and has “areas of potentially contaminative industrial activities”. Development of this site would be a health hazard. The recent news reports of a child dying from seepage of contaminated ground following flooding prove that developing any such sites is a danger to health. The Daily Mail has also recently had an article on how the dangers of living near landfill site raises cancer concerns. The paper referenced a study published by the International Journey of Epidemiology which tracked 242,000 people living near landfill sites in Italy.

I object to the proposal in the local plan on the grounds that both the Envirosearch Report RS1100201_1_1 dated 17th February 2004 identifies “potential risk from landfill gas migrations” which I believe is a health hazard.

I object to the proposal in the local plan on the grounds that both Envirosearch Report RS1100201_1_1 dated 17th February 2004 concludes “potentially contaminative industrial sites identified from analysis” of Ordnance survey maps.

I object to the proposal in the local plan on the grounds that the Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005-Identifes proposed site as a local authorised landfill site as licences under Part II of Environmental protection Act 1990. The proposed site is not a quarry as specified in the GBC Local Plan. And is therefore not suitable for the proposed usage.

I object to the proposal in the local plan on the grounds that the Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005-Identifes proposed site as potentially contaminative industrial land. With usage of “Heap and unknown constituents”. This causes me concern as to what it does contain and dangers if disturbed.
I object to the proposal in the local plan on the grounds that the Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005 Identifies changes to proposed site could cause potential ground water vulnerability to my property.

I object to the proposal in the local plan on the grounds that the Traveller Accommodation Assessment research, purported to have been undertaken in June-July 2012 by Mill Field Services, cannot be so. The Sittingbourne based market research company was dissolved in January 2011 according the government companies’ site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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<td>The increase in the number of houses which were too many to start with. Furthermore you totally ignore all the previous objections. Access will be almost impossible. Remember that Cameron “Would protect the Green Belt as I would my own family”!!</td>
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<td>Where on earth is democracy in this county?</td>
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<td>Flooding will be worse and it will effect the superb views.</td>
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<td>The site is contaminated. It is absolutely ridiculous that Travelling Show People should have plots here. Have you no respect for ancient woodland. Again no thoughts of infrastructure has been given as there will be far far too much traffic.</td>
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<td>This is an industrial development in the middle of a green belt. Again traffic gridlock will ensue! I find the whole plan unbelievable.</td>
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<th>Comment ID: PSLPA16/33</th>
<th>Respondent: 10870049 / Paul Bartlett</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<td>• I object to the poor provision for infrastructure improvements</td>
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<td>• I object to the lack of provision for more doctor's services</td>
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<td>• I object to no provision for increasing school places</td>
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<td>• I object that there are no plans to increase sewerage or water services.</td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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• There is insufficient public transport for the existing population, an increase of circa 7,000 houses with an associated number of cars is completely unrealistic for the local road network to which I object.
• I object to the lack of evidence for the alleged housing need numbers.
• The proposal to construct a large number of houses in a small area is unjustified and disproportionate and I object.
• With more evidence daily of the effects of road traffic on public health I object to the proposed large increase in vehicle numbers.
• I object to the large population increase such developments will bring without provision for more policing.
• Welfare services are currently overstretched, the population increase will make these services impossible to deliver.
• I object to the absence of protection to heritage sites.
• I object to the absence of protection to the environment.
• There has been insufficient consideration of SPA, SSI and Conservation Area issues to which I object.
• Cycling is hugely popular on local roads, there is a lack of proper cycle lanes on local roads. The proposes development and traffic increase with no inclusion of cycle lanes poses a real danger to cyclists to which I object.
• The above is true of footpaths to which I also object.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SLP16/107  Respondent: 10870049 / Paul Bartlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a local resident I object to the 2016 Draft Local Plan for a number of reasons:
• I object to the manner in which this has been introduced verges on being on undemocratic with a short consultation period with only six weeks notice given.
• I further object to the the inclusion of new sites with less than two weeks notice.
• There has been little or no consultation with local residents to which I object

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/944  Respondent: 10870113 / Ann John  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I wish to inform you that I am deeply concerned about the massive increase in the number of developments planned for The village of West Horsley. The residents have no idea how this figure was achieved and Paul Spooner is unwilling to discuss. We have been informed on numerous occasions that the green belt policy would not be effected and sadly this promise has been ignored. With the present plan proposed we do not have the schools GP surgeries Car parks Transport.

I had to go to London last week and could not find a parking space at the station.

Our roads are in a disgraceful condition some as bad as third world countries. Yet the council have made little attempt to re surface or repair potholes. What will they be like with the use of more traffic. We will be sinking and not driving.

Horsley has severe problems with flooding and this has caused a lot of problems over the years.

I am surprised as property prices are so expensive in Horsley how any affordable houses can be achieved.

Finally no consideration has been given to the residents of Horsley. I feel during construction process which will be on going the noise dust traffic will have a profound effect on peoples quality of life. with an increased respiratory conditions due to pollution etc. We pay a high council tax to leave in this area and we do have a say at what is going on

The draft proposed housing plan is completely unrealistic and not acceptable

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/733  Respondent: 10870177 / Sue Bolton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to make objections to the proposed housing and road developments proposed for the Send area.

1. The erosion of the green belt area when there are brown field areas in the Guildford borough and infilling has not been used.
2. Send is a village and has not the infrastructure for the amount of traffic that uses our roads at present and can not withstand the amount of extra traffic this will generate. I understand that funds have been allocated for Send Road over the next 10 years and with residential properties bordering this road has no capacity for widening and I can only assume that this money will be used to deal with all the potholes and deterioration that will ensue.
3. The proposal for slip roads will certainly increase the traffic as neighbouring areas will be driving through to join the A3.
4. Why has Send and surrounding area been chosen to provide a disproportionate amount of extra housing in the Guildford borough?
5. The present infrastructure is over stretched so how can it cope with all the increased population that these developments in the proposed plan will generate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ( )</strong></td>
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<tr>
<td>1. I object to the new interchange with the A3 at Burt Common. This will send an increasing volume of traffic through Send Road Send which is already overloaded. There was a planned link road proposed between Woking and the Wisely turn on the M25. This was abandoned in spite of the fact a large number of houses have been built in the area since. Current housing plans ignore the lack of infrastructure which should be in place before building more houses.</td>
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<tr>
<td>2. I object to Send Village being removed from the Green Belt. The green belt was intended to be permanent as required by the National Planning Policy Framework. Maximum use should be made of brownfield sites.</td>
</tr>
<tr>
<td>3. I object to the building of 45 houses at Clockbarn Nursery because of inadequate access and dangerous junction on to Send road.</td>
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<tr>
<td>4. I object to the building of 40 houses and 2 travellers sites at Send Hill because this is a country lane and there would be insufficient access and increased traffic.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send Marsh/ Burnt Common</td>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ( )</strong></td>
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<tr>
<td>I wish to register my objections for the proposed plans for developments in Send. namely policies A42, A43, A43a, A44 and A58. All these proposals will mean a greatly increased demand on the infrastructure which at present is not adequate. The traffic along Send Road and throughout the village is overstretched now and the medical centre and school is functioning at full capacity.</td>
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<td>I do not understand that as Guildford has REDUCED the numbers of houses planned why the Village of Send’s contribution has been INCREASED.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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| Comment ID: SQLP16/76  Respondent: 10870305 / Rosalyn Vickery  Agent: |
### Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I object because there has been no local consultation on the latest plans which are radically different to the ones which were proposed and consulted on in 2014.

I also object because the evidence for the number of houses required has not been published and it appears to have been greatly exaggerated.

I also object because the proposals are for building on greenfield sites rather than the brownfield sites that we know are available.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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### Comment ID: SQLP16/77  Respondent: 10870305 / Rosalyn Vickery  Agent:

### Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object on the grounds that Send should not be removed from the green belt because it provides a needed buffer between Woking and Guildford. The land at Garlick's Arch contains Ancient Woodlands and should thus be permanent green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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### Comment ID: PSLPA16/4095  Respondent: 10870529 / Catharine Rowden  Agent:

### Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I have been reading about the local plans for the Horsleys and Wisley Airfield and have various objections which I hope you will consider:

- I appreciate you have to build new houses but the number in the planning proposal is too vast. It needs to be reduced greatly.
- East and West Horsley needs to remain within the Green Belt for our generation and for our future generations to protect the heritage of the area.
- The impact of the number of houses on our roads, schools, medical services, utilities etc is too great. The current facilities will not be able to cope.
- I know there is a lot of opposition and I don't feel the planners are taking notice and ploughing ahead without considering the huge concerns.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3545  Respondent: 10870593 / Maureen Blackburn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Clockbarn

I object to building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.

Burnt Common / Garlick's Arch

I object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the (A247) would be gridlocked all day.

I object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25.

I object to the development at Garlick’s Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks’ notice and without any prior consultation and is not required in terms of housing need either for the village or the borough.

I object to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available.

I object to the development at Garlick’s Arch because the site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The site is also subject to flooding.
Interchange with the A3 at Burnt Common

I object to a new interchange with the A3 at Burnt Common because Send would then have the traffic from 2000 houses at Wisley Airfield, 2000 houses at Gosden Hill and 1850 at Blackwell Farm.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3543  Respondent: 10870593 / Maureen Blackburn  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Firstly I should like to state that I am appalled that after my objection over two years ago (one of 20,000). I should have to repeat the process. I consider the process now to be totally undemocratic and I now have no faith at all in local and national government.

All consideration: of Green Belt; infrastructure issues; insufficient school places; road access.

I live in Orchard Way and access is very difficult one might say almost impossible currently when schools are opening and closing.

The proposed development of houses and travellers site are ludicrous considering the narrowness of Send Hill. The loss of Green Belt is a disgrace especially when it was pledged to maintain it.
I took nearly ten minutes to get from Orchard Way to Send Surgery because of the school run and parked cars which are permanently there.

This would be much worse if the Send Hill developments go ahead.

The infrastructure; Schools, parking access, doctor's surgery and access for fire engines does not figure in the plan.

**Send Hill**

I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

I object to the proposal in the local plan on the grounds that the site is not large enough for the proposed use.

I object to the proposal in the local plan on the grounds that it would cause adverse impact on street parking.

I object to the proposal in the local plan on the grounds that Send Hill is a single track country road and too narrow to provide sufficient access to the site or accommodate the potential new levels of traffic the proposed development would bring.

I object to the proposal in the local plan on the grounds that Send is in green belt. The proposed inset is inappropriate due to its permanent green belt status.

I object to the proposal in the local plan on the grounds that Send Hill is a narrow road result in loss of a turning point for vehicles.

I object to the proposal in the local plan on the grounds that it would impact the nature reserve nearby. The proposed site is a quality green belt amenity area within countryside and would be spoilt by development.

I object to the proposal in the local plan on the grounds that the existing road and parking infrastructure is already inadequate or under pressure and could worsen with the planned development, reducing quality of life.

I object to the proposal in the local plan on the grounds that too many houses are proposed to Send/ Send Marsh are and the impact on traffic congestion and local services would be unacceptable.

I object to the proposal in the local plan on the grounds that the proposed number of houses potentially could result in 92 extra cars in Send Hill which is already suffering from congestion particularly at school run time.

I object to the proposal in the local plan on the grounds that this would cause loss of village identity, be detrimental to the community and increased flood risk.

I object to the proposal in the local plan on the grounds that a Wasteland Solutions environmental report on Send Hill dated March 2004 gave evidence of past ponding of water in the excavated area. Further development would disturb water table and increase risk of flooding to my property.

I object to the proposal in the local plan on the grounds that the proposed development site (A44) was used as GBC registered landfill site, not a quarry as listed as reference LLA 2081 in the local plan.

I object to the proposal in the local plan on the grounds that the 1963-8 Ordnance Survey maps of proposed site mark it as “refuse and slag heap”. It is therefore unsuitable for such a development on health reasons.

I object to the proposal in the local plan on the grounds that the 1971 Ordnance Survey maps of proposed site mark it as “refuse tip” prior to when proper licensing/registration was required. The date of the landfill works predates the 1999 EU Landfill Directive regulations. I therefore believe that there is a danger that any disturbance would be health hazard due to the unknown materials.
GBC has installed gas monitoring wells on site since July 2000. One well recording methane gas discharge.

I object to the proposal in the local plan on the grounds that a Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005-Identifies the proposed site as GBC recorded landfill site Ref GU/11/LLC with type of waste not identified. The date of the landfill works predates the 1999 EU Landfill Directive regulations. I therefore believe that there is a danger that any disturbance would be health hazard due to the unknown materials.

I object to the proposal in the local plan on the grounds that a Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005-Identifies proposed site GBC recorded landfill site Ref GU/12 with type of waste identified as “unrestricted”. This causes me concern as to what it does contain and dangers if disturbed.

I object to the proposal in the local plan on the grounds that both the Envirosearch Report RS1100201_1_1 dated 17th February 2004 and historical map data and information from GBC has identified site as landfill and has “areas of potentially contaminative industrial activities”. Development of this site would be a health hazard. The recent news reports of a child dying from seepage of contaminated ground following flooding prove that developing any such sites is a danger to health. The Daily Mail has also recently had an article on how the dangers of living near landfill site raises cancer concerns. The paper referenced a study published by the International Journey of Epidemiology which tracked 242,000 people living near landfill sites in Italy.

I object to the proposal in the local plan on the grounds that both the Envirosearch Report RS1100201_1_1 dated 17th February 2004 identifies “potential risk from landfill gas migrations” which I believe is a health hazard.

I object to the proposal in the local plan on the grounds that both Envirosearch Report RS1100201_1_1 dated 17th February 2004 concludes “potentially contaminative industrial sites identified from analysis” of Ordnance survey maps.

I object to the proposal in the local plan on the grounds that the Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005 Identifies changes to proposed site could cause potential ground water vulnerability to my property.

I object to the proposal in the local plan on the grounds that the Traveller Accommodation Assessment research, purported to have been undertaken in June-July 2012 by Mill Field Services, cannot be so. The Sittingbourne based market research company was dissolved in January 2011 according the government companies’ site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3564  Respondent: 10870593 / Maureen Blackburn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
However I object to Policy A42

The increase in the number of houses which were too many to start with. Furthermore you totally ignore all the previous objections. Access will be almost impossible. Remember that Cameron “Would protect the Green Belt as I would my own family”!!

Where on earth is democracy in this county?

Flooding will be worse and it will effect the superb views.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3567  Respondent: 10870593 / Maureen Blackburn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to Policy A43

The site is contaminated. It is absolutely ridiculous that Travelling Show People should have plots here. Have you no respect for ancient woodland. Again no thoughts of infrastructure has been given as there will be far far too much traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3569  Respondent: 10870593 / Maureen Blackburn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58

This is an industrial development in the middle of a green belt. Again traffic gridlock will ensue! I find the whole plan unbelievable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: pslp171/1757  Respondent: 10870593 / Maureen Blackburn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy 2 at paragraph 4.3.15 Again the views will be spoilt. Traffic will be impossible. Send is about to completely ruined with the efforts of the GBC!!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/393  Respondent: 10870625 / J.R. Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the final draft plans relating to Send and Ripley for the following reasons:

1) I object to the increase in the number of homes being planned which was 185 in April 2016 and has now increased to 485 and this has been done without any consultation.

2) I object to the removal of Send and Ripley from the Green Belt. Send provides a strategic buffer between Guildford and Woking with lots of areas which are used for local recreation.

3) I object to the 400 houses and the 7,000 sq m of industrial and warehousing at Garlick's Arch. This site was not included in the Regulation 18 draft and has not been subject to consultation.

4) I object to the new 4-way interchange onto the A3 at Burnt Common which would have disastrous effect on the traffic in Send and Ripley which is already congested and used as a cut through from Woking to the A3.

5) I object to the new proposal of building of 40 homes and 2 travellers pitches west of Winds Ridge and Send Hill. This is a new proposal and not included in the regulation 18 draft and has not been consulted upon. Development of houses is
inappropriate as the road is very narrow with no pavement or lighting. The land to be used for development was previously used for landfill waste which has to be vented. The area is very popular with dog walkers and is an area of beautiful countryside which would be spoilt by any development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

We are writing to you in order to voice our concerns and objections to the building proposals and changes which will we believe will be damaging our village life and destroy the character of our villages forever.

Our family moved to West Horsley 10 years ago. We moved from a really busy area (Walton-on-Thames) which has grown considerably since we first moved there in 1976, and We have witnessed the change in what was a ‘small town’ into an extremely busy large town, and not all for the better! This now seems to be the ‘future’ for The Horsleys.

- We moved to West Horsley village specifically for the green belt which surrounds us, this is now to be eroded, and you are taking us out of the green belt area! and the reasoning is for ‘exceptional circumstances’ which has not really been made clear.

We cannot believe that this type of development is being considered when in fact you have neglected (for many years) the current state of our roads in the village and I am especially referring to East Lane. We pay considerable council tax rates which have not been reflected in your surfacing and upkeep of the surrounding roads, and yet you:

- Propose an infrastructure for future development of the area which will certainly overload the capacity of the village (you can’t even keep the current roads in good repair so I cannot say I have much faith in the council!) This proposal will overload our villages.
- Many streets flood when we have torrential rain in the area and the drainage is inadequate at best – so with additional housing this will be a major problem.
- What will happen to our parking facilities in the village with all these extra cars (perhaps two per household).
- The GP surgery will be overloaded.
- Your estimated new housing numbers arising from a SHMA do not exactly match up to what appears to an inflated number of new houses needed which has grown considerable from your original plan. I understand that this is 70% higher that the official national estimate for population growth in the Borough. WHY!
- What effect will this have on the services in the villages. West Horsley households is estimated to increase by 35% this appears to be higher than any other single area in the Bourough. WHY!
- The development of 2,000 housing forming a village on the former Wisley Airfield will be enough in itself to overload our Horsleys.
- What will happen to East Horsley Village Centre if it is to be designated a ‘District Centre’ I fear this will make us very vulnerable for even future development. We will no longer be two villages but a small town, as you have also decided to blur the boundaries of the villages.

We do hope that our fears and those of our family and other residents will be taken into consideration before you demolish our villages; our way of life and extend the boundaries of the Settlement areas of Horsley.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I object to the evidence given by the GBC with regard to Send and Ripley, there is no longer a need for more industrial space and the supposed number of houses needed has been greatly exaggerated. In fact the Green belt does not have to be built on at all. there are brownfield sites available, I believe this is being pushed through for purely monetary reasons, not for true need and does not protect the environment. The roads through Send cannot cope as it is, the proposed plan would cause a constant gridlock and would be unmanagable. This new proposal is just that, a new proposal and should be treated as such, and should warrant a full consultation under Regulation 18.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: SQLP16/7</th>
<th>Respondent: 10871169 / Lynn Durbridge</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I object to the evidence given by the GBC with regard to Send and Ripley, I feel that the scale of it is more that the area can cope with. The infrastructure is not in place to be able to cope with such a large development. There is already a lot of traffic through the village and at peak times is constant and very slow moving. The scale of the new plan does not take this into account and the roads would grind to a total stop. There is no proof of the need for the industrial space and the number of new homes has been based on exaggerated figures.

The subsoil of at least one of the proposed sites has documented unsafe landfill waste, which is currently vented. Other sites have permanent Green Belt status and include ancient woodlands and beautiful countryside, some of which stop Guildford and Woking from forming into one!
I object to the lack of infrastructure and forward thinking within the hugely over the top and totally unnecessary loss of Green Belt land in the new proposed plan for Send and Ripley. I already have to wait over month for a regular appointment with my GP and it is hard to get emergency/urgent appointments with a designated doctor. The road to the local school is always a nightmare to navigate and the schools are always fully subscribed. The roads in general are at virtual standstill at peak times and the traffic through the village never ends. How does the new plan take this into account and apart from a massive new road junction what plans are there to make this all work smoothly?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the way the proposed plan for Send and Ripley has been put forward. The new plan is totally different from the previous one and therefore be treated as a totally new plan.... with full consultation under regulation 18.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I strongly OBJECT to the proposal to remove West Horsley and East Horsley villages from the Green Belt and the proposed development of all the new homes in the area.

It will put even greater strain on our already limited facilities and resources such as schools, doctors, railway stations, and local shops together with the limited parking spaces in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
My concerns regarding the plan are as follows:

• Why are you planning to build on the green belt when not all brownfield areas have been utilised and other less contentious areas are available for development? Losing the green belt means this land is lost for ever and opens the door to never ending expansion. Should we prepare for a large retail park is built next on the outskirts of the village?

• The building of such high density houses in the village in quite a concentrated area will destroy what is a quiet and rural village, which has been in existence for hundreds of years. These developments clash in style and density to the existing character of the village and will change the village forever. These developments equates to an increase of approx. 35% in the number of the existing West Horsley households, an increase larger than any other in the Guildford Borough.

• Nowhere in the plan is there any provision for any additional infrastructure. With 533 houses, based on current demographics, will mean a huge leap in demand for public services which cannot cope. These will include:
  ◦ No singular development is large enough to ensure the developers invest in any of the infrastructure of the area.
  ◦ Schools place both Primary and Senior: If 50% have 2 children, where are the 533 additional school places going to be when the schools are already heavily oversubscribed?
  ◦ Transport and parking: If 40% of homes have a commuter to London (212 people), where are they going to park? There is no room at the station car park and here is one bus every two hours! In addition, at peak time the trains are already very busy.
  ◦ Drainage: Although an element of investment has been made to improve drainage in West Horsley the roads still flood. The already fragile drainage just will not cope and we will have road closures for weeks again into the village.
  ◦ Roads: The roads in the village are not build to carry more traffic, a 20% plus increase in traffic will not only lead to significant congestion but damage to the environment. Currently the roads are in poor condition and deteriorating, how will it support the doubling of traffic around the village?
  ◦ Lighting: There are approx. 235 new homes planned for on or just off East Lane, with the increased proportion of children in to the area the roads will be highly unsafe as there is no street lighting and completely inadequate foot paths.
  ◦ Medical: The doctors surgery is already bursting at the seams, if the mix of older people and families, as I would expect, moving to the new homes this is going to going to result in much more than 20% increase in patients.

• The Ockham development with 2000+ homes is almost going to double the number of homes, while there has been limited mention of infrastructure, this has not extended to the impact on road and load public transport network which will be swamped by the additional traffic.

Again it appears that the plan has been made, which is lacking in detail and thought for the current village feel. While these developments may help the housing shortage, it will destroy the villages of East and West Horsley by over developing them and irreversibly changes the character of them forever.

I trust that you will take my views and that of the other local residents into serious consideration when finalising the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the scale of new homes and industrial buildings proposed for this area in the local plan and that Garlicks’ Arch, including an other access point to the A3, has been added at a very late stage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9783  Respondent: 10871329 / Lyn Gargan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This local plan is in danger of joining all the villages in to and extension of London suburbs, creating a huge urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9784  Respondent: 10871329 / Lyn Gargan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object that the present infrastructure and is lack of ability to cope with the people who are already resident here and that this has not been addressed. Our doctors, The Villages Medical Centre, is over stretched as it is. The local schooling is not able to accommodate the children who live within a reasonable distance to access their education within their community

I cannot see that this local plan addresses this and that there is perhaps another agenda that us, as local residents are not party to.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I strongly object to the fact that our roads already are fit to bursting at least twice daily, during the rush hours. The A3 is constantly blocked at the turn off to Guildford Town, the two lanes at the Wooden Bridge section are also constantly blocked and can take extended time to complete a simple journey. Having had to attend the Royal Surrey County Hospital for cancer treatment on a regular basis, this stretch of road became a nightmare journey for me, never knowing what time to leave and if I would get there for my appointments.

I object strongly to lack of the Guildford Planning Department and Local Plan developers to understand and take action on the A3 access to the M25 at Wisley, to the most heavily used section of this orbital motorway. How on earth do they propose to add a 25% increase in the homes and the traffic that that will bring to this section alone?

I strongly object to the increase in pollution that will be generated by the increase in traffic using, already crowded roads, to access the new A3 at Burnt Common.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I am writing to object in the strongest terms to the building on green belt land in the area of Send, Ripley, Send Marsh, Burnt Common and the Clandons.

I object strongly to the changes in the Green Belt boundaries, This is not justified.

All the Green Belt sites locally meet the five purposes of Green Belt inclusion.
The Green Belt serves five purposes:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9781  Respondent: 10871329 / Lyn Gargan  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Building new homes on urban brownfield sites, or within the villages’ envelope must be the first recourse to providing the homes for young people and families who wish to stay in the area, or for people who want to move here for their work, or to escape urban sprawl

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1307  Respondent: 10871329 / Lyn Gargan  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the numerous developers who are buying up plots of land in the hope of building very expensive houses on green belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/10  Respondent: 10871329 / Lyn Gargan  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt, Policy 2 at paragraph 4.3.15

Taking Send Business Park out of the green belt completely.

The Send Business Park on Tannery Lane has been to all intents and purposes a non-conforming user in an area of natural beauty adjacent to the river Wey navigation. To extend this use will change the very nature and fabric of the area.

The narrow road which allows access to the existing industrial site is already an issue for the community and to extend the site will cause traffic and snarl ups on an already heavily used main road through Send. A road that is used by school children to access their education, both by walking and by buses to schools outside the village. Making an even earlier start for the buses to get the children to school on time through the rush hour traffic.

Another very important consideration to take in to account is the destruction of the openness of this area, due to the Green Belt protection. In my view a wanton dismantling of an important environment that we, as residents and members of this community, treasure.

Please consider very carefully before you irreparably destroy this area for reasons that don’t adhere to the values and lives that we live.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/218  Respondent: 10871329 / Lyn Gargan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object strongly to the Policy A43 changes to Garlick’s Arch for the following reasons:

I wrote previously to make my thoughts known about the proposed plan and at that time thousands of other local people made their objections clear and this seems to have been ignored in the continued development of this plan.

I have not been convinced that there are exceptional circumstances for the Green Belt to be ignored and therefore changing the use to allow more development in the future without having to consult with the communities is not acceptable.

As I said in my opening paragraphs that the plans are unnecessarily excessive in the number of dwellings to be built. Changing the very nature and fabric of our community.

Send and Sendmarsh are on the flood plain, which is allocated as Flood Zone 2.
Zone 2 Medium Probability
Land having between a 1 in 100 and 1 in 1,000 annual probability of river flooding; or land having between a 1 in 200 and 1 in 1,000 annual probability of sea flooding. (Land shown in light blue on the Flood Map)

Taken from: Guidance
Flood risk and coastal change- Department for Communities and Local Government, Planning practice guidance and Planning system, 6 March 2014

The footings and excessive number of houses to be built will inevitably upset the water table and therefore could cause flooding in houses already built. This happens when the water accumulating on flood plain is displaced and has to find the easiest path. This will cause a knock on effect to so many areas, not least damage to existing houses. As has happened in Walton on Thames, West and East Mosley. As our climate changes and there could be more periods of heavy rain this will be a crucial aspect for the planning committee to address. Making sure that existing flood plains are able to do the intended role of holding access water in times of need.

The joining up of Ripley and Send will defeat the key purpose of the Green Belt, to keep green space between the communities for them to maintain their identity as a functioning community and not an amorphous mass of dwellings with no community identity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

Re: the latest changes to the Local Plan 2017 in respect of Garlick's Arch and the Burnt Common sites:

**My background:** We have lived in this house since 1981 and chose to live in this area due to its accessibility to the open countryside, the community and village atmosphere and facilities. We took into consideration the easy access for us to work in London and the environs.

Already this is becoming impossible to do in a decent time frame, as the traffic is excessive on the A3 and M25 between Junctions for the M23 and the M40. Adding so many more households with cars who will need to use these routes will make travel impossible. Taking into account the plans for a Town on Wisley Airfield, the plans for Merrow, this will only be exacerbated.

I am very aware that we need to provide more housing for young people to stay in the area, houses for older people to down size and social housing. This can be done within the area of the village envelope for Send and the village envelope for Ripley. Doing this without overwhelming the facilities and infrastructure already in place.

I object strongly to the Policy A43 changes to Garlick's Arch for the following reasons:

- I wrote previously to make my thoughts known about the proposed plan and at that time thousands of other local people made their objections clear and this seems to have been ignored in the continued development of this plan.
• I have not been convinced that there are exceptional circumstances for the Green Belt to be ignored and therefore changing the use to allow more development in the future without having to consult with the communities is not acceptable.
• As I said in my opening paragraphs that the plans are unnecessarily excessive in the number of dwellings to be built. Changing the very nature and fabric of our community.
• Send and Sendmarsh are on the flood plain, which is allocated as Flood Zone 2.

Zone 2 Medium: Land having between a 1 in 100 and 1 in 1,000 annual probability of river flooding; or land having between a 1 in 200 and 1 in 1,000 annual probability of sea flooding. (Land shown in light blue on the Flood Map)

Taken from: Guidance

Flood risk and coastal change

From: Department for Communities and Local Government Part of:

Planning practice guidance and Planning system Published:

6 March 2014

• The footings and excessive number of houses to be built will inevitably upset the water table and therefore could cause flooding in houses already. This happens when the water accumulating on flood plain is displaced and has to find the easiest path. This will cause a knock on effect to so many areas, not least damage to existing houses. As has happened in Walton on Thames, West and East Mosley. As our climate changes and there could be more periods of heavy rain this will be a crucial aspect for the planning committee to address. Making sure that existing flood plains are able to do the intended role of holding access water in times of need.
• The joining up of Ripley and Send will defeat the key purpose of the Green Belt, to keep green space between the communities for them to maintain their identity as a functioning community and not an amorphous mass of dwellings with no community identity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/219  Respondent: 10871329 / Lyn Gargan  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
**Burnt Common Plans London Road Policy A58**

I object to Policy A58 at Burnt Common because:

This had been deleted from the 2014 draft due to the strong objections put forward. But now it is back in the plan and the word minimum instead of maximum has been used. Why has the wording changed?

With empty buildings and sites available on the Slyfield and other industrial areas in Guildford it is not necessary to provide a minimum allocation of 7,000 sq m of industrial or warehousing buildings on this site.

Stated in the 2017 Employment Land Needs Assessment there is evidence of reduced demand to 3.9 hectares for the whole borough and not the need for the larger allocation of over 10 Hectares in the Send Green Belt.

**There is a need to understand why the council is going for the maximum projected use on all counts.**

The impact on the narrow roads and the surrounding access roads will be huge. Industrial vehicles needing to use this for accessing the proposed sites will exacerbate the accidents and fatalities from the exit off the A3 Burnt Common road.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I object to Policy A58 at Burnt Common because:

- This had been deleted from the 2014 draft due to the strong objections put forward. But now it is back in the plan and the word minimum instead of maximum has been used. Why has the wording changed?

- With empty buildings and sites available on the Slyfield and other industrial areas in Guildford it is not necessary to provide a minimum allocation of 7,000 sq m of industrial or warehousing buildings on this site.

- Stated in the 2017 Employment Land Needs Assessment there is evidence of reduced demand to 3.9 hectares for the whole borough and not the need for the larger allocation of over 10 Hectares in the Send Green Belt.

- There is a need to understand why the council is going for the maximum projected use on all counts.

- The impact on the narrow roads and the surrounding access roads will be Industrial vehicles needing to use this for accessing the proposed sites will exacerbate the accidents and fatalities from the exit off the A3 Burnt Common road.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Comment ID: pslp171/62  Respondent: 10871329 / Lyn Gargan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Taking Send Business Park out of the green belt completely.

- The Send Business Park on Tannery Lane has been to all intents and purposes a non-conforming user in an area of natural beauty adjacent to the river Wey navigation. To extend this use will change the very nature and fabric of the area.
- The narrow road which allows access to the existing industrial site is already an issue for the community and to extend the site will cause traffic and snarl ups on an already heavily used main road through Send. A road that is used by school children to access their education, both by walking and by buses to schools outside the village. Making an even earlier start for the buses to get the children to school on time through the rush hour traffic.
- Another very important consideration to take in to account is the destruction of the openness of this area, due to the Green Belt protection. In my view a wanton dismantling of an important environment that we, as residents and members of this community, treasure.

Please consider very carefully before you irreparably destroy this area for reasons that don't adhere to the values and lives that we live.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2794  Respondent: 10871361 / Chrissie Sainsbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5. I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

7. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9. I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10. I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPA16/2807  **Respondent:** 10871425 / Tim Collins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )

I object to the size of size of the development proposed

The need for nearly 14,000 proposed new houses is not supported by evidence based research or scientific study. The figures supplied by the council are flawed in many respects and to this day serious questions are yet to be answered on the validity of the model used to calculate the area’s housing need.

I am especially concerned about the damage that will be caused to small local communities, in particular, West Horsley, East Horsley, Normandy, Ockham, Ripley, Send and Clandon. The number of new houses proposed for these villages is out of all proportion to the existing settlements.

I object to not protecting the Green Belt

The Green Belt concept was put in place to protect the countryside and provide space and enjoyment for all. To infringe on the Green Belt between the borough’s existing settlements will lead to a merging of towns and villages, removing open space and robbing future generations of our beautiful rural areas.

Over 70% of the proposed development is on Green Belt and flies in the face of the principle of the Green Belt. I’m extremely suspicious of the motives of the local council in their pursuit of this ill conceived plan and more so the ‘exceptional circumstances’ justification

I object to the congestion that development will cause to the local village roads and the lack of planned road infrastructure

The A3 and the village roads around Horsley are already congested. Many of the roads in Horsley are narrow, without pavements for pedestrians. To add more vehicles into the mix would have a damaging effect on the character of our rural areas.

I object to the expansion of commercial land in the urban area losing the potential for further housing.

There are sites available in Guildford Town Centre earmarked for further commercial and retail development which could instead support affordable small houses and flats for young buyers, close to the town’s amenities and existing infrastructure. The council have not demonstrated a need for further retail space when increasing numbers of shoppers are buying on line and the need for first time buyer’s properties is much greater.

I object to Brownfield sites not being re-developed for housing
Existing Brownfield sites and unoccupied properties must be developed for housing rather than reducing the size of our Green Belt.

**I object to development without improvements to local infrastructure**

Local facilities eg doctors, schools, transport facilities in Horsley are already stretched. Any development planned must take account of required improvements to local infrastructure. The number of homes currently planned for West and East Horsley is entirely unsustainable.

I would support limited new development in West and East Horsley, WITHIN the existing village boundaries and on existing developed sites like the Ramada Thatcher’s Hotel (Ref A36, ID 2044) and the Bell and Colvill Garage (Ref A37, ID 16) as long as the local infrastructure is improved to cope.

I would NEVER support the building of homes on the Green Belt and I object to the village boundaries being extended to increase the availability of land for housing. However, I would support the building of a new Raleigh School in East Lane (Ref A41, ID 2063) as I believe this need to be exceptional (the current site is not sustainable for the existing population of the village) and there is no other local site previously developed which would be large enough or suitable for a new school.

I urge the council to revise the local housing needs and amend the Local Plan so that development of Brownfield sites is undertaken and the Green Belt protected for future generations.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/2792  **Respondent:** 10871457 / Ronald Sainsbury  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –**

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5. I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9. I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10. I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
• I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.
• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Concerns

West Horsley is a rural community. The plan almost doubling the amounts of housing would cause the Destruction of the character of the village putting intolerable stress on the local infrastructure. Already schools and Gp's struggle with servicing the community

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5377  Respondent: 10872001 / Allanah Morris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Removal of the green belt would mean easy use of cheap farming land for housing rather than using appropriate more expensive brown field sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5379  Respondent: 10872001 / Allanah Morris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Provision of housing with all amenities such as suggested in the brown field site at Wisley Airfield would appear more appropriate cause less disruption.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5378  Respondent: 10872001 / Allanah Morris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

West Horsley East lane has a problem with flooding. This is a common event with a heavy down poor and also effects gardens and patio area's. If the local fields are built on this will increase the problem.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4058  Respondent: 10872353 / Robin Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Send Village being removed from the Green Belt. There is no justification for abandoning the Green Belt framework and its rationale; nor for the breach of pre-election promises. Abandoning Send's Green Belt status will inevitably be the first step in Woking and Guildford becoming one rambling and unacceptable conurbation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7562  Respondent: 10872353 / Robin Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **I OBJECT** to building 45 houses at Clockbarn Nurseries. Our access on to Send Road is from Sandy Lane, opposite Tannery Lane: this is a difficult and dangerous junction at the best of times; and things will be made worse by this additional building.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7565  Respondent: 10872353 / Robin Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **I OBJECT** to the proposed development at Garlick's Arch. The site floods and is covered by ancient woodland. The proposed industrial development is not required in this Green Belt site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7568  Respondent: 10872353 / Robin Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **I OBJECT** to the new interchange with the A3 at Burnt Common. This will inevitably increase the traffic, pollution etc in Send Road. We have already experienced on a couple of occasion in recent years when other local road repairs have forced traffic to use Send Road how severe these problems can/will be.

The proposed developments will destroy the fabric of Send, and hence my strong objections to all of them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPS16/7567  Respondent: 10872353 / Robin Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the development of 40 houses and 2 travellers' pitches at Send Hill. This is a highly inappropriate location in a high amenity area of beautiful countryside

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 

Comment ID: PSLPA16/2791  Respondent: 10872545 / David and Rachel Price  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposed amount of new housing actually needed in the area has apparently been inflated by using the Strategic Housing Market Assessment (SHMA). This number which is only based on a consultant’s mathematical model and not revealed to the local plan, is then increased even further by Guildford Borough Council to give a highly inflated suggested population increase. This is potentially 70% higher than official estimates for the growth of population within the Borough. The scale would mean an increase in a huge 35% of existing West Horsley households. This is higher than any other single area in the Borough. It is very worrying that the Council are relying on such data without really knowing what the real figure would be. This is very alarming and worrying. We need clarification on this. Much needed housing affordable housing in some areas is much needed and inevitable but to inflate the housing number using dodgy data just should not be considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 

Comment ID: PSLPS16/5775  Respondent: 10872545 / David and Rachel Price  Agent:
**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

This development has been already refused planning by Guildford Borough Council and must not be allowed. Again the local infrastructure is just not able to cope with the potential of an additional 4,000 cars on local roads. This would have a hugely detrimental impact on to the villages of East and West Horsley, as well as the same problem outlined in item 3 of the overloading of roads, flood risks and added strain on station carparking, doctors surgeries and schools. This area is adjacent to one of the busiest and most accident generating stretches of the A3 as it joins the M25 and more traffic using this section would make matters worse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/11697  **Respondent:** 10872545 / David and Rachel Price  **Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I understand that due to a misreading of the type of facilities at the Station Parade, that this small village area could become reclassified as a “District Centre”, which would open it up to inappropriate development in the future. To visit the Station Parade would show that this is a thriving parade of village shops, including independent cafes and businesses, as well as bank, and chemist, and a small Budgens. The Budgens is small enough to be able to trade unrestricted hours on a Sunday. There is a library and family run butchers as well as two cafes, both independent. Any future development on a large scale would mean that the smaller businesses would be pushed out in favour of larger retail conglomerates. The whole nature of the village would be changed and we would lose a valuable and vibrant village centre. I understand that the decision to form a district centre in East Horsley would be made on the basis of a misreading of the nature of the facilities here. There is no room for any development here, and no room for the extra car parking that that would generate. This is a very concerning issue. Our village centre is just that, not a business centre.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/11696  **Respondent:** 10872545 / David and Rachel Price  **Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The local infrastructure just cannot cope with any more housing or retail development in the area on this scale. There is a severe drainage issue in this area, with standing water already making driving hazardous during wet weather. The various schools in the area generate high levels of traffic, and the route through the villages have become rat runs from the A3 to the A246 and beyond. Try making a right turn out of Ockham Road South onto the A246 during rush hour. It’s a serious accident waiting to happen with cars attempting to use the driveway of the Duke of Wellington pub as a cut through to avoid the mounting queues of waiting cars. The proximity to the petrol station also situated on that junction makes it an extremely dangerous manoeuer. Increased traffic from more housing, and more businesses will be intolerable for the community. The local schools are stretched to bursting point and the doctors’ surgery is also overloaded and there doesn’t seem to be any mention in the local plan of improving these vital services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11692  Respondent: 10872545 / David and Rachel Price  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This would be a very detrimental leaving both the Horsleys exposed to the spread of urbanization from all sides. The two distinct areas of West and East Horsley would lose their separate identities and merge with each other, and the creeping tide of development would engulf from Effingham, and Bookham, and, if it were to go ahead, the new proposed development of over 2000 houses in Ockham. The green belt must not be removed from the Horsleys and the ‘exceptional circumstances’ that are required to be shown before taking this drastic action have not been demonstrated. The Horsleys lie adjacent to the area of the Sheepleas, a designated Area of Natural Beauty, Site of Special Scientific Interest, and Local Nature Reserve. To allow unchecked development to the south of this beautiful and special place should removal of the green belt be proposed, would be truly sad. The area is well loved by visitors from far and wide, not just from the local area, who come to enjoy the natural beauty of these ancient woodlands, and undisturbed meadows. But the other areas of more ordinary green space, the fields, the hedges, the patches of woodland, the wildlife corridors, are all very special, and deserve our protection. The protection of our fragile environment must be the number one consideration here. Once it’s gone it’s lost forever. Surrey is a under ambush from the creeping tide of urbanisation probably more than any other county in the country and we need to make firm decisions regarding it’s safeguarding NOW.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11695  Respondent: 10872545 / David and Rachel Price  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

To extend the boundaries into the village settlement, is just another sneaky way to allow more land to become available for development, and again will increase the size of our two villages to ridiculous proportions, bearing in mind the lack of infrastructure. No sound reasons have been given as to the actual reason for doing this, apart from making it much easier for future development to get through. This needs to be addressed further.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6547  Respondent: 10872577 / Carol Finlayson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• The building of such high density houses in the village in quite a concentrated area will destroy what is a quiet and rural village, which has been in existence for hundreds of years. These developments clash in style and density to the existing character of the village and will change the village forever. The increase in housing equates to an increase of approx. 35% in existing West Horsley households, an increase larger than any other in the Guildford Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6548  Respondent: 10872577 / Carol Finlayson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
• Nowhere in the plan is there any provision for any additional infrastructure. With 533 houses, based on current demographics, will mean a huge leap in demand for public services which cannot cope. These will include:
  ◦ No singular development is large enough to ensure the developers invest in any of the infrastructure of the area.
  ◦ Schools place both Primary and Senior: If 50% have 2 children, where are the 533 additional school places going to be when the schools are already heavily oversubscribed?
  ◦ Transport and parking: If 20% of homes have a commuter to London (106 people), where are they going to park? There is no room at the station car park. There is one bus every two hours!
  ◦ Drainage: Although an element of investment has been made to improve drainage in West Horsley the roads still flood. The already fragile drainage just will not cope and we will have road closures for weeks again into the village.
  ◦ Roads: The roads in the village are not build to carry more traffic, a 20% plus increase in traffic will not only lead to significant congestion but damage to the environment.
  ◦ Lighting: There are approx. 235 new homes planned for on or just off East Lane, with the increased proportion of children in to the area the roads will be highly unsafe as there is no street lighting and completely inadequate foot paths.
  ◦ Medical: The doctors surgery is already bursting at the seams, if the mix of older people and families, as I would expect, moving to the new homes this is going to going to result in much more than 20% increase in patients.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6550  Respondent: 10872577 / Carol Finlayson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

• The Ockham development with 2000+ homes is almost going to double the number of homes, while there has been limited mention of infrastructure, this has not extended to the impact on road and load public transport network etc.

No responsible decision can be taken with a view to such unwanted expansion of the village without out addressing satisfactorily the above issues. They are too important to be brushed over and ignored.

I trust that you will take my views and that of the other local residents into serious consideration when finalising the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6546  Respondent: 10872577 / Carol Finlayson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My concerns regarding the plan are as follows:

- Why are you planning to build on the green belt when not all brownfield areas have been utilised and other less contentious areas are available for development? Losing the green belt means this land is lost for ever and opens the door to never ending expansion. How long will it be before a retail park is built on the outskirts of the village?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6543  Respondent: 10872577 / Carol Finlayson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Local Plan for West and East Horsley

I write yet again to express my grave concerns at the local plan which has been put forward by the Guildford Borough Council. Especially in the proposed removal of East and West Horsley for the Green Belt area and the extension of the boundaries of the settlement areas of the Horsleys.

Overall I understand that there is a need in the borough for new homes and do not oppose development providing it is in keeping, in proportion and does not fundamentally change the character of the area. However the current plan for East and West Horsley is neither in proportion or character to the local area.

Surely it would be much better to focus the development in Guildford which already has good infrastructure and amenities? The brownfield areas of Guildford should be utilised first, where high density building fits and would be desirable. Expanding the boundaries of Guildford, where people have elected to live in a town, would not fundamentally change the character of the area. This could then be supplemented by smaller developments spread out throughout the villages of Guildford Borough, which would not have the detrimental effect that the proposed large developments in Horsley and Ockham would have.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/337  Respondent: 10872641 / Theresa Gianotti  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

What right do you have to remove Ripley and Send amongst 15 other villages from the green belt when it was put in place to protect them and therefore their inhabitants. The scale of your proposed developments would seem to be completely disproportionate to the area and there will be little chance of halting further over development in the future - completely against the green belt policy. I believe the council is acting in an underhand way and misleading its constituents. The council should be protecting and valuing its 'green environment, not planning to destroy it.

- I object to a document that is over 1800 pages long and not user friendly;
- I object to all erosion of the green belt;
- I object to site A43 Garlicks Arch;
- I object to any "in-setting" of any villages from the green belt;
- I object to the disproportionate amount of development in our area of the Borough;
- I object to the last minute inclusion of new sites;
- I object to the lack of evidence for any alleged housing need numbers;
- I object to the further strain that will be placed on existing health care facilities
- I object to the further strain that will be placed on police services
- I object to the further strain that will be placed on existing roads and country lanes.
- I object to the council's disregard of governments commitment to Green Belt protection
- I object to the number of traveller sites proposed in a small area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPS16/2651 | Respondent: | 10872801 / Graham Philip | Agent: |
|-------------|--------------|-------------|------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy A35 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the above planning application on the following grounds:

- the removal of the Former Wisley Airfield from the Green Belt. The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford.
- No exceptional circumstances have been established to warrant removing the site from the Metropolitan Green Belt.
- There is ample brownfield land in urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.
- the disproportionate allocation of a proposed increase in housing to the nearby localities of Ockham, Ripley, the Horsleys and Effingham.
- the threat the Local Plan as drafted poses to the historic rural settlements of Ockham, Hatchford and Downside.
- The plan calls for Ockham, a hamlet of 159 residences to be subsumed into development, on presently open land, with 2,000 dwellings and other urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- Hatchford, south of the M25, has some 60 residences off narrow Ockham Lane that would be greatly affected by the proximity of development.
- the potential harmful impact on transport, local roads and road safety by the suggested development. The result of an additional 2,000 homes would be an estimated 4,000 additional cars together with other vehicles, including HGVs, to service the development.
- The increased traffic would cause congestion and danger on the narrow rural roads in Ockham, Hatchford, Downside and Cobham. Cobham is the closest shopping centre to the proposed development. The village could not cope with the additional traffic and car parking involved in serving some 5,000 additional occupiers at the site and would experience a significant increase in stationary/idling traffic at peak times and at junctions.
- Due to the absence of cycling paths and the lack of footpaths (and the space to provide them) the assertion that the development would result in a meaningful shift to cycling and walking is unbelievable. The increased traffic would add danger to cyclists and pedestrians (including those increasingly using local roads for recreational purposes).
- There would be an increase in the already severe congestion on the Strategic Road Network of the A3 and M25 and the junction of those as well as local roads. The current planning application by RHS Wisley would already have significantly added to visitor traffic. Any proposed secondary schooling would add additional congestion.
- The lack of suitable public transport. The local rail stations of Effingham and Horsley could not cope with the proposed increase in passenger traffic and car parking is already at capacity. In the refused planning application there had been a suggestion that Cobham & Stoke D’Abernon Station could be used. That or use of stations further north at Weybridge or Walton would increase congestion and pollution on local roads in Elmbridge.
- the issue of air quality not being taken seriously. Air pollution in this area in the north of the Borough of Guildford and the south of the Borough of Elmbridge and particularly near the M25/A3 junction already exceeds EU-permitted levels. Additional traffic would worsen the situation, affecting the health of all current and future residents.
- insufficient consideration being given to the environmental and ecological value of the site and the area around it, taking account of the Thames Basin Heath Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the above planning application on the following grounds

- the removal of the Former Wisley Airfield from the Green Belt. The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford.
- No exceptional circumstances have been established to warrant removing the site from the Metropolitan Green Belt.
- There is ample brownfield land in urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.
- the disproportionate allocation of a proposed increase in housing to the nearby localities of Ockham, Ripley, the Horsleys and Effingham.
- the threat the Local Plan as drafted poses to the historic rural settlements of Ockham, Hatchford and Downside.
- The plan calls for Ockham, a hamlet of 159 residences to be subsumed into development, on presently open land, with 2,000 dwellings and other urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- Hatchford, south of the M25, has some 60 residences off narrow Ockham Lane that would be greatly affected by the proximity of development.
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- The increased traffic would cause congestion and danger on the narrow rural roads in Ockham, Hatchford, Downside and Cobham. Cobham is the closest shopping centre to the proposed development. The village could not cope with the additional traffic and car parking involved in serving some 5,000 additional occupiers at the site and would experience a significant increase in stationary/idling traffic at peak times and at junctions.
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- the issue of air quality not being taken seriously. Air pollution in this area in the north of the Borough of Guildford and the south of the Borough of Elmbridge and particularly near the M25/A3 junction already exceeds EU-permitted levels. Additional traffic would worsen the situation, affecting the health of all current and future residents.
- insufficient consideration being given to the environmental and ecological value of the site and the area around it, taking account of the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCl).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to Ripley and Send being removed from the Green Belt. This area of Green Belt prevents the joining up of Guildford and Woking and is against the principles agreed by local councillors and central government to protect the Green Belt. The rash of new development being now discussed would just be the beginning.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I write to object to the aspect of the Local Plan relating to Wisley Airfield.

1. This development will lead to the urbanisation of Green Belt land, a precedent that will lead to urban sprawl towards Guildford.

1. Any developments in this area will increase traffic flow in an area that is already often congested with M25 and A3 junction. This congestion spills into local towns such as Cobham compromising the amenity for local residents.

1. Local public resources are saturated. GP's surgeries, schools, police and transport are currently inadequate. Further population would require new resources.

1. Local towns would be overwhelmed with limited access roads, limited parking and would be less accessible for current residents.

1. To support any developments in the area of Wisley, Ripley and Send would require new shops and public amenities. This investment would need further development to justify costs, which would create out of town shopping areas. In turn this could reduce footfall in local towns.

1. Air pollution in this area is often poor being at the junction of M25 and A3. This section of the M25 is the busiest road in Europe.

1. Wildlife is profuse in these areas and any developments would impact them greatly.

1. With no public transport close to this area residents would be reliant on cars or buses. The roads in this area are unsuitable for larger vehicles or increases in volume.
1. Application 15/P/00012 was unanimously rejected by Planning Officers due to concern such the ones I have mentioned.

It is important that local views and expertise is respected and that the democratic process is respected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3173  Respondent: 10872961 / Liz Cass  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A39

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A39: Land near Horsley Railway Station, Ockham Road North

Site A39 is on Metropolitan Green Belt land and I do not believe that the Council has made a defensible argument for developing on the Green Belt. As such I object to the development of site A39 on these grounds.

In addition, any site which is developed must have adequate infrastructure to support it. This includes transport, schools and flood defence. This statement is relevant for all proposed developments. In relation specifically to site A39:

- The area around Ockham Road North is already highly prone to flooding, with the road prone to severe flash floods with any heavy rain. The gardens in the vicinity frequently develop large pools of water following heavy rain. Site A39 is acknowledged to be a flood zone and is extremely boggy after heavy rain. With a significant increase in impenetrable ground, due to the roads, driveways, patios and rooves associated with 100 houses, the current problem would become worse and in my view would present a significant risk of more serious flooding causing flood damage to homes downstream of the development. Given the incidences of flood damage across the UK in recent years, it does not seem to me to be at all sensible to build such a large quantity of houses on or close to a known flood zone. Any development of the site should only be considered if the developers were required to invest the sums required to result in an improved drainage system and lower risk of flooding in all affected areas after the development had been completed compared to the current situation.

- While the site is close to the train station the train service is already extremely crowded. With additional users from site A39 and other sites proposed in the Horsley and Ockham area, it is highly likely that the trains to and from Waterloo will be standing room only. The train journey is 50 minutes.

I object therefore to the proposal for Site A39.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6927  Respondent: 10872961 / Liz Cass  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In this policy GBC have taken no regard whatsoever of the differences in affordable housing need across the borough. This has significant consequences in East Horsley, which is the area with the lowest demand for affordable housing in the borough. Under Policy H2, 40% of all but the smallest development sites in East Horsley will be required to have affordable housing built upon them, irrespective of whether there is demand for more social housing in that area.

As a result of this defective affordable housing policy, a significant volume of social housing is likely to be built in places where it is not needed and offered to tenants who do not want to live there nor have jobs near that location.

I object to Policy H2 on the basis that it fails the test of sustainability.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6929   Respondent: 10872961 / Liz Cass   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There are significant shortcomings in the infrastructure of Guildford Borough as it stands today and the aggressive housing policy as proposed by GBC in this Document will exacerbate this problem.

The local infrastructure is not set up to deal with significant population growth and additional housing. Current examples in East and West Horsley include:

1. **Through roads already very busy at peak times**, have multiple pot holes, and have pavements which are either very narrow, do not exist at all, or are in extremely poor condition. This makes the village unsuitable for high volumes of any kind of traffic, let alone the volume of HGVs now using it. As a mother of 3 young children using the pavements daily to walk to school, it is unfortunately only a matter of time before the deteriorating traffic, road and pavement combination will result in a serious incident.

2. **Drainage system already very prone to overflows**, eg, on Ockham Road North from the railway bridge to the junction with East Lane, every time there is heavy rain, resulting in the road becoming akin to a river. Road repairs last year have done absolutely nothing to alleviate the problem.

3. **Schools already significantly over-subscribed** with local children

4. **Limited bus service.**

5. **Train service to London already very busy.** Additional commuters would make it likely that not everyone getting on at Horsley station at peak time would get a seat, despite the journey being 50 mins into London Waterloo.

There are no proposals in respect of any of the existing problems with roads, pavements, drainage, transport and schools.
It is inevitable that the proposed developments in East Horsley and in West Horsley and Wisley, will put further strain on the existing infrastructure. The failure to address the serious inadequacies of the existing infrastructure to meet the needs of what is there already is a serious omission in GBC’s Document.

Furthermore, and as I also described in my comments about removing East Horsley from the Green Belt, East Horsley is an attractive village for people wishing to relocate from more built up areas, due its village feel. That includes the village school, The Raleigh. Our family, and many of our friends chose to move to Horsley precisely because of the primary school, which manages to retain a village feel, yet is of ample size to provide the facilities required for children from Reception – Year 6. The existing school would not be able to cater for an increase in demand, and unless we wish to remove the current attractiveness of this village school, nor should we consider an increase in the numbers.

I therefore object to the infrastructure proposals contained in GBC’s Document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6928  Respondent: 10872961 / Liz Cass  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P2: Green Belt

Policy P2 states that: “We will continue to protect the Metropolitan Green Belt.” However, through the housing policies set out in the Document, GBC appears to be in breach of this policy through the housing policies. Approx. 65% of the developments proposed by GBC are to be built on land currently within the Metropolitan Green Belt and there appears to be little attempt to reduce housing delivery in order to take account of this.

Paragraph 4.3.13: Proposal to inset East Horsley from the Green Belt

Policy P2 proposes that East Horsley should be inset from the Green Belt. East Horsley is set in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving the rural character and openness of this village, and this is a key factor in attracting people to relocate to the village, often from the built up areas of South West London. By train, it remains a commutable distance to London, and its rural setting is a key factor in attracting people looking to relocate. Development on the Green Belt would undoubtedly erode the attractiveness and appeal of East Horsley.

The Green Belt has existed for many decades, with good purpose and great success, and I do not believe there is evidence that this situation should be reversed at this time.

I object to the proposal to inset East Horsley from the Green Belt and request that this proposal is removed from the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/6926  Respondent: 10872961 / Liz Cass  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S2: Planning for the Borough

The policy sets out the objective of adding 13,860 new homes to Guildford Borough over 2013 – 2033 period of the Document. This is 693 new homes per annum and represents a net increase of 25% in the housing stock of the Guildford Borough. This is quite staggering given the Office of National Statistics is projecting a population increase of 15% for Guildford Borough over this same period. For West Horsley, this would represent an increase of 35% on existing households which is greater than any other area within the borough.

I believe development over this period should be commensurate with such growth and urge GBC to ensure new development in any given village is proportional to the Borough’s need (c. 15% over 20 years) and in keeping with the existing environment.

I object to the housing targets set out in Policy S2

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/302  Respondent: 10872993 / Nicola Slynn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I think that building a road tunnel under the A3 at Guildford is a very good idea. It would materially help traffic flow through the town centre. It would make the A3 much safer as the current junctions are not very safe. Every time there is an accident there the town centre is gridlocked by traffic seeking an alternative route.

It would be so good to have the current A3 acting as a road for local traffic to avoid the town centre. Just widening the existing A3 would not do this.

So much of any successful expansion of Guildford depends on sorting out the traffic and esp the gyratory system. Sorting the A3 is a major step in the right direction

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.
**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPA16/4016</th>
<th>Respondent: 10873313 / Rob Stevens</th>
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I write with regards the proposals to remove Send from the Greenbelt protection and the plans for excessive and massively impacting developments in Send and surrounding areas.

Please share with the planning inspector.

I object to the appalling suggestion to remove send from the Greenbelt. There is no good reason for this and if the Greenbelt protection were to be removed this would simply benefit the developers. Why ever would such a crucial protection to our green areas be removed? There is no justification to do so, no need and no wish from the local area. I feel let down by the council that this is even suggested as a solution for them to bypass the protection and over develop long protected areas to achieve a volume of houses not even needed in the area because they cannot make use of brownfield sites as they should.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPS16/7475</th>
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I object to the proposed houses at Clock barn nurseries site. Tannery lane is tiny, already congested and a nightmare to turn out of. The local infrastructure is already over burdened. This makes no sense and needs to be stopped.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Comment ID: PSLPS16/7476  Respondent: 10873313 / Rob Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed development at Garlicks Arch. An area which floods, is covered in lovely old woodland should not be bulldozed to over stress the local infrastructure and put in industrial areas where they should not be. What is the purpose of Sly field industrial estate if not to accommodate industrial needs? This is another dodgy deal being done to benefit a developer with no concern to the Greenbelt or the impact on those who live here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7478  Respondent: 10873313 / Rob Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a new interchange at Burnt Common and the insane impact this would have on our already heavily traffic affected village. Traffic would be even worse and with the other proposed developments at Wisley Airfield and Burpham we would just see more and more traffic with cars for the approx 4000 homes using the roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7477  Respondent: 10873313 / Rob Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposed development in Send Hill. Put the pitches in the vast land at Ockham on Wisley Airfield. Send Hill is a tiny lane and can't take any more traffic. Consider the area before making these poor suggestions. The area is also I understand a unsafe landfill area put back to countryside. What are you thinking?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16636  Respondent: 10873313 / Rob Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Finally... overall I am utterly frustrated at a Council which should be protecting the local areas from inappropriate development which seems to have lost site of its duty and is trying to achieve new housing in the area at the detriment of the locals, with no regard to the over burdened infrastructure and all to achieve some target imagined up as being needed by someone and seeing these little villages as the place to damage to achieve it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16637  Respondent: 10873313 / Rob Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

To even consider the development scale being suggested and to remove villages from the Greenbelt to achieve it is beyond disgraceful. Represent the residents and stop cow towing to central governments ridiculous quest for housing numbers without considering the impact and long term consequence for the green areas for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3886  Respondent: 10873313 / Rob Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Page 207 of 2167
I object to this proposal as anyone who lives in Send who uses Tannery Lane knows the small rural lane is utterly unsuitable for further developments to take place, turning into Send Road from Tannery takes an age and is difficult to exit to Send Road. You have already allowed, despite objections which I assume were again just ignored, a marina no one wanted and which we all knew was a precursor to further development requests. Not only have we been ignored but you have this time decided to INCREASE the number of houses for the site by 30 odd%. The impact on traffic, the green belt, amenities and the area itself makes this a completely unacceptable development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3887  Respondent: 10873313 / Rob Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

I object to this and simply don't understand how the protection of green belt in this manner can be allowed. what possible exceptional circumstances cam be shown to make this acceptable? None. The inclusion now of pitches for "travelling show people" is a clear attempt to drive this through roughshod despite the thousands of objections you have received as by suggesting there is a need for travelling show people pitches is cynical use of a minority, by suggesting such a need even exists. You should be ashamed at your blatant attempt to bypass the protection of a lovely area to get your way and build some 400 homes to meet some central government quota which takes NO consideration of impact. This is unacceptable and should not proceed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3888  Respondent: 10873313 / Rob Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58
I object to this (previously removed) item being brought back, bigger and more impacting than even before, despite the huge volume of objections which led it to be removed previously. Its been brought back as a minimum of 7000 sq m of warehousing and appears to show utter disregard for the unnecessary damage to the green belt (which I believed was protected but which the GBC seem to feel is just protected in the past to make it available for them to squander now and future generations will simply be deprived of if GBC don't step up and take a better/correct stance and protect it). Why is this even on here? I presume as a concession, of the line of "Lets add something back in which we had a load of objections to before and removed. When these people complain again we will concede and let this unnecessary one go, and they will take the other ridiculous plans getting rubber-stamped better", GBC need to remove this plan once and for all. The 2017 Employment Land Need Assessment shows less of this type of property is needed and Slyfield has land and vacant buildings to accommodate such a need, if one even appears! Stop causing upset and concern for Send and surrounding villages and accept this is not needed, impacts the locals and the environment/green belt and is not even needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1985  Respondent: 10873313 / Rob Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I Object to the proposal to inset Send Business Park from the Green Belt. Its in the greenbelt, clear and simple. Coming up with sneaky ways to circumnavigate protection for the Green belt seems to be GBC's plan to force through development which will cause long lasting devastation to the local villages and all ton meet some quota someone has made up. GBC should be defending us from this short sighted approach, protecting the green belt for us and for future generations and standing up for us. There are son many reasons this should not proceed. I am not sure how many times we can mention that Tannery Lane is a small rural lane with poor access and it simply cannot accommodate more traffic. Send and surrounding villages deal with a lot of traffic and to suggest adding more by finding a way to get this out of the greenbelt (despite the fact its clearly within and surrounded by greenbelt) is unacceptable. Its the thin edge of the wedge and you know it... you start with this and then it simply opens up the option for further development. GBC needs to step up and stop ANY intrusion or impact to the greenbelt.

Please share with the planning inspector.

I truly hope you do listen to the objections, to the locals and the overwhelming concern for the impact to our villages and the green belt. The area cannot take the level of development you are proposing and there is simply not a need either. Stop this and put these plans to death. Do your jobs and protect the local area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp17q/372  Respondent: 10873313 / Rob Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?
I am extremely disappointed to need to write to you once again on the subject of the ill conceived local plan and its detrimental effects on the village of Send, surrounding villages, residents, infrastructure/amenities and the Green Belt.

I can only assume that the council has no regards for local impact and the protection of the green areas for future generations as GBC have seemingly ignored us and is determined to push on despite the hundreds of previous objections by locals.

That is frankly appalling and this latest "revision" is a clear attempt to side step all those previous objections, restricting us to only make objections to the amendments. I am sure the council is hopeful that by dragging this out they may wear everyone down - or simply proceed anyway after constant reissues by finding sneaky ways to fulfill their objectives.

This is all made the madder when there are brown field/previous use sites like Wisley Airfield which are a far more suitable location for some new housing, if the council is determined to ignore the local impact, at least that's not green belt.

Anyway, here we are again, registering objections to a plan so impacting that surely someone in power is already aware it is senseless damage to the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
What is more unsettling is the revelation that the Council is unwilling to release the evidence base it has used to justify the need for 14,000 new houses in the Borough. Surely if the Council was confident in the accuracy of its proposed housing figure it would have the courage and conviction to release the information. Not to do so simply fuels an understandable suspicion that the 14,000 figure cannot be justified. Furthermore, I understand that the reason given by the Council for not releasing this information is that it is the “intellectual property of a third party and is commercially sensitive”. This is ridiculous. Are we really expected to believe that this third party, GL Hearn I believe, whom the Council has engaged owns the evidence and whatever models have been produced to derive the 14,000 figure? If this is true then whichever Council employee agreed to this has made a monumental procurement “cock-up”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
As a resident of West Horsley you will not be surprised to learn that I vehemently object to the Plan's proposals for building more than 2500 new homes in this vicinity. It is Green Belt land and should remain so. There is no justification for development on this scale in this area, and there are certainly no "exceptional circumstances" to allow the Council to build on the Green Belt here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7673  Respondent: 10873377 / Rebecca Howard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

It is simply astonishing that the Council is considering building new housing in the Green Belt when there is so much unused brown field land in the Borough that could be used for housing. There are no “exceptional circumstances” to justify changes to the Green Belt and I can only assume that recommendations to do so are being determined by developers’ preferences in terms of where they can make the most profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9514  Respondent: 10873377 / Rebecca Howard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
I am deeply concerned by Guildford Borough Council's latest Draft Local Plan and object to the housing development proposals detailed in it.

It is simply astonishing that the Council is considering building new housing in the Green Belt when there is so much unused brown field land in the Borough that could be used for housing. There are no "exceptional circumstances" to justify changes to the Green Belt and I can only assume that recommendations to do so are being determined by developers preferences in terms of where they can make the most profit.

What is more unsettling is the revelation that the Council is unwilling to release the evidence base it has used to justify the need for 14,000 new houses in the Borough. Surely if the Council was confident in the accuracy of its proposed housing figure it would have the courage and conviction to release the information. Not to do so simply fuels an understandable suspicion that the 14,000 figure cannot be justified. Furthermore, I understand that the reason given by the Council for not releasing this information is that it is the "intellectual property of a third party and is commercially sensitive". This is ridiculous. Are we really expected to believe that this third party, GL Hearn I believe, whom the Council has engaged owns the evidence and whatever models have been produced to derive the 14,000figure? If this is true then whichever Council employee agreed to this has made a monumental procurement "cock-up".

I am also aware that whoever is, or has been leading this work for the Council, does not appear to have applied the new planning framework correctly. Neither have they sought to align this Plan with the guidance received from Ministers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9532  Respondent: 10873377 / Rebecca Howard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I trust that my views will be fully considered and that the Council will have the maturity and common sense to revise the current Plan and ensure that the next version is based on sound, freely available evidence and fully incorporates the feedback of the Borough's constituents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1151  Respondent: 10873377 / Rebecca Howard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am also aware that whoever is, or has been leading this work for the Council, does not appear to have applied the new planning framework correctly. Neither have they sought to align this Plan with the guidance received from Ministers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/303  Respondent: 10873409 / Brian Weller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a resident of Send Road I must object to the planned junction at Burnt Common/ A3 and taking the surrounding areas out of the green belt is a mistake and a disaster for Send. It's obvious that this is going to increase traffic on an already overcrowded road, there seems to be no plans to deal with the congestion as it is already without adding more danger for pedestrians and cyclists and of course added pollution.

I also must object to the inset of the green belt, what's the point of green belt if it can be removed when it suits. The protection of the green belt just about keeps Send as a village still, which is why most people like to live here in the first place. As a life time resident of Send I feel that these changes are being forced upon us without considering local people's views. Obviously we need more housing but not at the expense of the green belt and inconsiderate plans for the people living on a increasingly busy Send road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2697  Respondent: 10873441 / Anthony Kennedy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed development in Normandy of approximately 1,100 homes as well as a secondary school and retail space contained in the GBC Local Plan 2016 on the following grounds:-

1. The development is on Green Belt farming land of outstanding beauty and there has been no sound reason put forward why this Green Belt need be used in Normandy. The proposal is developer lead and an easy solution to the GBC's problem of building more houses in the area. There is other scruffy land in the area which would be more suitable for development but has not been put forward as it is not owned by the developer.
2. The proposed secondary school is not required in the area west of Guildford as there are sufficient places now, and in the future, even with development west of Guildford, in the present schools, Ash Manor and King's College.

3. If any development takes place in the Normandy area the road infrastructure will require improvement prior to any new homes being completed otherwise gridlock will occur much more frequently than at present. A priority must be a bridge over the railway at Ash. The rail service to Guildford is also inadequate and a new station will be required at RSH as a priority. Sewage is also of concern as I understand that all the pipes in the Normandy are past their use by date.

4. There is already little 'open space' between Guildford and Aldershot. This development in Normandy would be another 'nail in the coffin' for the open space.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2619  Respondent: 10873633 / Monika Brewer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.
- I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.
- Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will mean either major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.
- Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3130  Respondent: 10873633 / Monika Brewer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
2. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”
3. Opportunity (3) should be common to all sites and is not unique to this site

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
weeks’ notice and without consultation. I also object to the failure to include the Town Centre Masterplan, within the new proposed plan.

I object to all development at Garlick’s Arch, as the site is covered in ancient woodland, which dates back at least to the Tudor period. The ancient woodland is of particular conservation sensitivity.

I also object to the development at Garlick’s Arch as it is prone to flooding and is land which provides a “run-off” from the A3. It is also land which is higher than and adjacent to Send Marsh, which, as its name suggests, has also been subject to flooding in the past and could also be adversely affected by the Garlick’s Arch development.

I object to the proposed industrial development at Garlick’s Arch as the latest Employment Land Needs Assessment 2015, shows a reduction of 80% in required employment floor space from the previous draft plan. There is also a 40ha site available at Slyfield, a site outside the Green Belt.

I object to the Clockbarn development, due to inadequate access and to the volume of existing traffic on the A247 through Send, which this traffic will have to feed into. This would be in addition to the 64 houses given planning permission at the Tannery and to the marina development.

I object to the proposed development of 40 houses at Send Hill, due to the further destruction of Green Belt land and the fact that the subsoil of the existing site contains documented unsafe landfill waste, which is currently vented. The proposal to include two travellers pitches is also inappropriate due to the insufficient access to the site.

I object to the destruction of Green Belt land without proper consideration to the irreversible damage to beautiful countryside and ancient woodland, without consideration to the 2015 Town Centre Masterplan, without consideration to a proper consultation period, without consideration to the need for proper infrastructure in radically changing Green Belt villages, without consideration to the need of additional support facilities and without the consideration to the complete destruction to the face of Green Belt villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPA16/743</th>
<th>Respondent:</th>
<th>10873953 / David Bennett</th>
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As a resident of Horsley and frequent user of facilities in Ripley and Clandon, I am writing to object to your plans for both villages.

1. Object to any expansion of the Green Belt. The council has repeated said that it will protect the Green Belt. The Green Belt should be considered sacrosanct and be left unaltered for our future generations, thus meeting the original intention of the Green Belt. This creep in reducing the Green Belt is unacceptable.

2. I object to the developments in Horsley, Ripley and Clandon which are proposed without satisfactory consideration to their impact on local facilities and infrastructure. Local roads, schools, medical resources, shops, railway station parking, and parking for shopping cannot support the intended expansion.
3. I object to the Wisley airfield development owing to the pressure that will be caused to local facilities and infrastructure. Local roads, schools, medical resources, shops, railway station parking, and parking for shopping cannot support this intended expansion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6571  Respondent: 10874017 / Diane and Tony Cuff  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to the ‘large strategic site’ approach to meet the housing needs where these sites have such an overwhelming visual impact on the local area. (NPPF 11 stated purpose: Conserving and enhancing the natural environment).

Boarding the North Downs AONB, Policy sites A26 and A46 would be very noticeable developments and easily seen both day and night. (Design Policies- Policy D4: Development in urban areas and inset villages).

‘Brown field sites’ and ‘land-banked sites’ must be fully utilised before any erosion of Green Belt is considered. (NPPF stated purpose).

We disagree with the current SHMA document being used as basis for housing needs. University student accommodation appears to distort housing needs. Brexit may influence the university student numbers.

The approach of making small adjustments to the settlement areas of each village and town, throughout the borough, should be strongly considered. Small developments can be absorbed easily within the existing area with very little effect on the environment, visual impact, transportation needs and all the supply services. The addition of small numbers of residents can easily integrate into the community and lead to a stronger more vibrant society.

We object most strongly to the proposed development designated ‘Policy A46 Land to south of Normandy and north of Flexford’. This is a developer led proposal that is totally out of scale to the surroundings.

Normandy and Flexford are small countryside villages. There is not the infrastructure to support the proposed 70% to 100% increase in housing development. Normandy and Flexford should be considered as separate residential areas. Creating such a large block of housing would totally destroy the easy open nature of the villages.

We object to the proposed new secondary school as two of the nearest local schools are under subscribed. A new school with 1500 places away from the main catchment areas would mean the majority of students travelling into Normandy and undoubtedly a large percentage would use the car for convenience. St. Peters and County schools have approved expansions. Expansion to the closest existing schools would be a far more cost effective solution. (NPPF stated purpose). The access roads to/from the proposed development are the C16 Westwood Lane and D60 Glaziers Lane. These roads will not cope with the additional car movements from ‘school runs’ and residents work travel during peak hours. Westwood Lane has a dangerous single lane railway bridge with limited headroom and Glaziers Lane has an angled hump backed bridge. These two roads feed onto A323 Aldershot Road to the north and the A31 Hogs Back to the south. Both these roads are notorious for their queuing at peak times.
It is an unacceptable practice for a developer to use the inclusion of a school as a ‘sweetener’ to justify commercial interests.

The massing of the proposed development does not relate to the existing open nature of Normandy village. (Design Policies- Policy D4: Development in urban areas and inset villages).

We should try to maintain the setting and special character of them. (NPPF stated purpose).

We object that this developer lead proposal gives no consideration to the unrestricted sprawl of large built-up areas. (NPPF stated purpose).

We object to the creation of a development corridor from Guildford to Aldershot (Waverley) boundary along the A323. It would be devastating to nature and the environment. We must prevent neighbouring towns from merging into one another. (NPPF stated purpose)

Normandy should have limited development to secure nature conservation interests and retain the attractive landscape between the urban areas of Guildford and Aldershot. This proposal lies within the zone of protection to the Thames Basin Heath Special Protection Area so consideration must be given to its protection.

We object that this proposal gives no consideration to assist in safeguarding the countryside from encroachment. (NPPF stated purpose).

This site is not just ‘grassland’ as stated. It is using viable class 3 agricultural land that must be maintained and used to help feed the growing national population. As a nation we cannot and must not rely on imported products, they will become unsustainable and unaffordable.

The roads, the electrical, gas, telecommunications and water supply and drainage are constantly under strain to maintain current levels of demand. Breakdown of supply is frequent. With the added hard standing and reduction of natural water soak away flooding will be far worse than present levels.

Health care and emergency services are at full capacity.

The settlement areas of Normandy and Flexford should be as deemed by the existing properties. We object to any major change.

The Core planning principle that planning be genuinely plan-led, empowering local people to shape their surroundings must be considered.

We must not use a convenient cheapskate option today that our children and future generations will pay heavily for and never recover from.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2854  Respondent: 10874241 / James Grzinic  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the increase in pressure on our local infrastructure. The local schools are full, it is virtually impossible to get a
doctors appointment without a wait of at least several days, roads and car parks are already in poor condition and
overloaded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3890  Respondent: 10874241 / James Grzinic  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the use of the SHMA target housing number being used to justify the disproportionate increase in housing stock
in our villages

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3891  Respondent: 10874241 / James Grzinic  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the proposed extension of the boundaries of the settlement areas of the Horsleys because I do not
believe that any sound reason for this to take place has been given.
2. I object to the increase in pressure on our local infrastructure. The local schools are full, it is virtually impossible
to get a doctors appointment without a wait of at least several days, roads and car parks are already in poor
condition and overloaded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5890  Respondent: 10874241 / James Grzinic  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
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I object to the development of over 2,000 houses at Ockham Village. The impact on the narrow roads in and around our villages would be intolerable. The local train stations at Effingham and Horsley could not cope with any increased demand. I commute daily into London from Horsley, and the car park is already overflowing given current requirements, so I am intrigued to understand how the plan supposes the implicit, major increase in rail users will be accommodated within the existing infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to Station Parade in East Horsley being designated a ‘District Centre’ which is it not.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11921  Respondent: 10874241 / James Grzinic  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to remove the Horsleys from the Green Belt on the grounds that the ‘exceptional circumstances’ required before taking this action have not been demonstrated

I object to the proposed extension of the boundaries of the settlement areas of the Horsleys because I do not believe that any sound reason for this to take place has been given.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/3351  Respondent: 10874273 / Margaret Pearce  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

SITES. I object to all policies involving building in the Greenbelt as NO EXCEPTIONAL circumstances have been shown, excessive numbers of houses have been proposed, and the clearly expressed views of residents have been ignored. I especially object to Policies A36, A37, A38, A39 A40, A41. The number of houses far exceeds local needs, and the density is excessive. There is no local support for these. The COLLECTIVE IMPACT of these together with the WISLEY development has NOT been considered. Key infrastructure is lacking. There is no adequate provision made to increase the waste water capacity. There is a lack of schools, and health centres. The doctor’s car park is always full. Most of the local roads are narrow with no pavements or only a single one. Already we are frequently forced to drive onto the pavement when lorries are driving through the village. Cycling is very dangerous and we have many cyclists coming from London at the weekends and during the week practising for the Prudential road race, or just for the pleasure or cycling the Surrey Hills.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
SITE A35 WISLEY. A very, very, very strong objection to this. It was rejected by the council already, I cannot see why it has been included. This is not a brownfield site, it is supposed to be a Surrey County Council waste site. A lot of good farming land will be lost which will have an enormous effect on the local wild life. The extra number of cars the 2000 homes will have on the A3/M25 and local roads will be enormous there are already traffic jams at the A3 Wisley roundabout, and M25 junction 10 roundabout, often made worse when the RHS gardens have a special event on or even in school holidays. In order to give the proposed residents of the new town access to the Southbound A3 the proposal is to make Old Lane from Effingham Junction one way from its cross roads with the Ockham - Cobham road this will allow entry onto the A3, but not exit. Exiting onto the A3 here is slow and can be dangerous as you are faced with two lanes of traffic coming fast from the motorway roundabout, followed immediately by another two lanes of fast moving traffic coming off the westbound lanes of the motorway. If lucky you can get out before the next lot of fast cars arrive. I can see long queues. I also object strongly because many people come off the motorway to get home to Effingham Junction, Horsley and also Bookham. If the road is one way they will have to drive through East Horsley to get where they want to go. I also object to the road closures they want to make. I object to this plan because there is no public transport. Both car parks at Effingham and Horsley stations are already full each day. The flooding that occurs often as you approach the A3 roundabout from Ockham/East Horsley will be worse as water runs off roofs and roads. Where will the sewage go. Who will have to pay for the cost of building a new treatment plant. Last but not least there will be an unacceptable increase in air pollution. These are all my objections to the proposed draft plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to policy D4 (development in urban areas and inset villages) I object because there is no commitment to expand social housing or accommodation for people who cannot afford the so called affordable homes. The objectives for inset villages are cancelled out by plans for excessive growth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13663  Respondent: 10874273 / Margaret Pearce  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy E8 (District centres). Too much scope to expand rural district centres is given which will be able to justify major housing expansion across countryside (these) will spoil the character or the Horsley and Ripley villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13660  Respondent: 10874273 / Margaret Pearce  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy H1 (homes for all) it fails to compel The University of Surrey to use its existing planning permission for student accommodation which would free up houses needed in the town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13661  Respondent: 10874273 / Margaret Pearce  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy H2 (affordable homes). Affordable homes are I understand to be about 80 percent of the price of normal prices for the area. Due the high cost in the area these so called 'affordable' homes are not affordable for young people like teachers, policemen, or firemen or nurses we have just had some affordable houses built in East Horsley at a cost of nearly £700,000.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy P2 (green belt) they seemed to have ignored what the impact of building on Greenbelt land will have on water catchment, air pollution and bio diversity. What will the effect of the cars from 2000 new houses on the proposed Wisley development do to the already high air pollution levels along the A3/M25, Ockham, Horsley area. The loss of so much Metropolitan Greenbelt will not help the air pollution of London. Providing some bit of greenbelt on the other side of Guildford even further away from London will not help, neither will people want to travel there. The only people who it helps are the Ex., and Present leaders of the council who come from Ash, the new proposed Greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the Guildford Draft local plan. In particular I object to 1) policy S2 (Borough wide strategy) the number used for needed houses is too high and based on a secret formula.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3819  Respondent: 10874273 / Margaret Pearce  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ()

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site Policy A35. The council have already rejected building planning for the Wisley site on fourteen reasons, one of which is because it is in the Green belt. I cannot see how they can now include it on their new revised local plan. I object to the inclusion of building on the Wisley site. Policy D1. I object to the inadequate provision of infrastructure investment as I have stated before. I shudder to think of the increased traffic queues in both directions along the A3 and M25 junction, and on the great increase in air pollution which is already high in this area. I also object to the fact that they want to close some of our local lanes and make others one way. Finally I repeat again that I strongly object to the latest draft of the Guildford Borough Council local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1939  Respondent: 10874273 / Margaret Pearce  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ()

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P2 I object strongly to the insetting of both Horsleys from the Green Belt. A large percentage of new housing is proposed to be built in the greenbelt and this land is mainly in the North-East of the borough which is closest to London. This greenbelt land was meant to help keep the air clean and fresh and prevent encroachment of the metropolitan area. I object to the proposed new change to the settlement boundaries to the South (part Policy P2).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford Borough Council’s plan to allow up to 5,000 houses in the beautiful Green Belt of Ripley, Ockham, West Clandon and Send appears to us to be ill conceived. We cannot understand why the Council would suggest these developments. When we wrote to G.B.C. regarding the proposed Wisley Airfield development we pointed out that utter chaos on the local roads would inevitably ensue if that development went ahead. Only people without knowledge of the area would suggest building hundreds of houses to add to the already over-burdened roads.

As lifelong Conservative supporters we are utterly bemused by the actions of Guildford Borough Council. Admittedly the country needs more housing but why impinge on the Green Belt to achieve this goal? Surely it would be more sensible to extend existing built-up areas and estates where there are already shops and schools and where the roads can be extended without causing excessive congestion. Why ruin an attractive village such as Ripley because of ill-thought-out plans? Woking traffic should not have to go through Ripley from the A3, and how does the Council think the extra traffic they are proposing to incur is possibly going to cope?

Surely Guildford Borough Council must look further afield and make sure the Green Belt remains green.

I object to the final draft plans relating to Send and Ripley for the following reasons:

1) I object to the increase in the number of homes being planned which has increased from 185 in April 2016 to 485 and this has been done without any consultation under Regulation 18.

2) I object to the removal of Send and Ripley from the Green Belt. Send provides a strategic buffer between Guildford and Woking with lots of areas which are used for local recreation.

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the 400 houses and the 7,000 sq m of industrial and warehousing at Garlick's Arch. This site was not included in the Regulation 18 draft and has not been subject to consultation.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to the new 4-way interchange onto the A3 at Burnt Common which would have disastrous effect on the traffic in Send and Ripley which is already congested and used as a cut through from Woking to the A3.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to the new proposal of building of 40 homes and 2 travellers pitches west of Winds Ridge and Send Hill. This is a new proposal and not included in the regulation 18 draft and has not been consulted upon. Development of houses is inappropriate as the road is very narrow with no pavement or lighting. The land to be used for development was previously used for landfill waste which has to be vented. The are is very popular with dog walkers and is an area of beautiful countryside which would be spoilt by any development.</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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</table>
I am writing in support of Policy A21. (Westborough Allotments)

My husband is co-owner of one of the allotments and I wanted to get in touch to stress how important this allotment is to my family and the local community.

This allotment provides fresh fruit and vegetables for my family which not only saves us money but ensures we have a healthy diet. There is actually so much produce that grows that we also hand this out to neighbours, friends and people at church so they can also enjoy.

I also want you to be aware of how much enjoyment this allotment brings our family, especially my dad (the other co-owner). He visits it daily, often early in the morning and benefits enormously from the quiet, sanctuary and peace that the allotment brings him. He has a very busy job, works long hours and is constantly in demand. The allotment is his place he can escape to and just enjoy being in the fresh air and enjoying his gardening. It is wonderful that it is so close to home too. He also enjoys taking the grandchildren to visit the allotment and teaching them about how things grow. They love to visit and help to pick and eat the produce.

It would be a tragedy if this allotment space was taken away. Having been there since WW1 it has an historical place in our local community and should be protected as a rare area of green space. There is a real sense of community amongst those who have an allotment and that should be respected. I know there is also a have a self help group WASHA which runs educational groups for local school children and novice gardeners.

Allotments are so important for the green space of a city and should be protected at all costs so future generations can enjoy them as much as past generations. Therefore I also support Policy I4.

I also want to add that the vehicle access to the Westborough allotments is also crucial. It is so important to be able to access this area and park. Not only to be able to bring equipment and take produce home easily but also that people often visit early in the morning when they might not feel as safe walking out and about.

I urge you to take serious consideration to the points made and protect these allotments for the good of our community, health, green space and future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPA16/594  Respondent: 10875937 / Mark Tottman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing again to register my continued and very strong objection to your plans for housing development in the Horsleys in response to the Proposed submission local plan: strategies and sites June 2016. As a long standing resident of West Horsley, I continue to be appalled by your plans for our village and the surrounding countryside. My objections are:

- Housing Numbers - our village infrastructure cannot meet the proposed additional number of dwellings. Our drains, our water supply and our roads cannot cope with the proposed number of new homes. Building this number of homes will lead to significantly increased flood risk - we already suffer from this issue now. In addition, more cars, means more pollution, and more queuing for local amenities.

- Negative impact on services. Our local schools are already full so local people would have to send their children outside the area to go to school. That is unacceptable. Our medical centre is full, one has to wait for an appointment if you are ill. Building more homes in the village will make this worse. That is unacceptable and ill thought through.

- Green Belt - This proposal would fundamentally change the character of the village. My understanding of The National Planning Policy Framework is that it requires any change of Green Belt boundaries to demonstrate exceptional circumstances. Unmet housing need is not an exceptional circumstance in law. So the Green Belt boundaries should not be changed. To remove most of the Horsleys (and other villages in the Borough) from the Green Belt would change the nature of this area of countryside forever and would eventually merge historic and separate villages. This is outrageous and unacceptable.

Brownfield Sites - there is considerable land available in Guildford which could be used for housing (e.g. Surrey University, vacant commercial sites, derelict land. This should all be used up before any consideration is given to destroying the character of our village(s).

In summary, you have got this wrong. The NPPF requires that any new residential developments respect the character and density of housing in the area and should be limited by the availability of local infrastructure and facilities. For the reasons I have given above, you are not complying with the policy framework. I continue to object to the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3233  Respondent: 10875969 / Valerie Austin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In summary, you have got this wrong. The NPPF requires that any new residential developments respect the character and density of housing in the area and should be limited by the availability of local infrastructure and facilities. For the reasons I have given above, you are not complying with the policy framework. I continue to object to the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the removal of the Former Wisley Airfield from the Green Belt

I object to the impact that such a development will have on the environmental and ecological value of the site.

I object to the continued inclusion of a site where the planning application has already been unanimously rejected by GBC's Planning Committee.

I trust that these objections will be fully considered and that the Former Wisley Airfield, (Three Farms Meadows), Allocation is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/7116  **Respondent:** 10875969 / Valerie Austin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the threat the Local Plan poses to the historic village of Ockham and to my Hamlet of Hatchford

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/7115  **Respondent:** 10875969 / Valerie Austin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land that could be regenerated.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/7114  **Respondent:** 10875969 / Valerie Austin  **Agent:**

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### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate allocation of housing in this particular part of the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID:</th>
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### Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Once again I object to the above plans for many reasons, too numerous to list.

The major objections I have are:

1. The proximity to the A3 and M25 that are heavily congested even now.

   The narrow lanes around Hatchford, Downside, Ockham and Cobham will have to cope with even more traffic in addition to the heavy use by cyclists and horse riders. Walkers, already restricted, will have little chance to enjoy their local area. Any problems with traffic flow on the above road and motorway away results in streams of vehicles diverting onto the local lanes.

2. I object to the higher level of air pollution that will result from the addition of the houses and flats and their associated vehicles.

   Pollution levels are way above European recommendation already and a worry for people living in this area.

3. Local facilities such as schools, doctors' surgeries, shops, railway stations and their car parks are already over subscribed.

4. I object to the use of the Green Belt and the subsequent threat to wildlife.

5. The proximity to RHS Wisley where visitor numbers have increased dramatically over the last few years and will continue to do so as Wisley expands its facilities and events.

   To sum up, I believe this plan is unsuitable for the location and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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I object to the proposals for the Wisley airfield site (site A35) - totally disproportionate in size to the surrounding settlements and too dense relative to surrounding areas. There is a real risk of "them and us" emerging given the strength of local feeling against this development. I think it could cause real unrest in the area and potential discord between new and old residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Garlick's Arch proposal (site A43) for the same reasons.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Site A57 for traveller pitchers in Rose lane is part of an ongoing planning issue where planning authority has been repeatedly abused and ignored. For this reason, amongst others, it should be rejected: accepting this proposal simply sends out the message that ignoring Guildford Borough planning authority earns you no penalties and eventually gets you what you want!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A57</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<tr>
<td>Site A57 for traveller pitchers in Rose lane is part of an ongoing planning issue where planning authority has been repeatedly abused and ignored. For this reason, amongst others, it should be rejected: accepting this proposal simply sends out the message that ignoring Guildford Borough planning authority earns you no penalties and eventually gets you what you want!</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<td>I object to policy D3 - enhancing the historic environment is very difficult if you are building modern buildings around it and removing green land which has surrounded it for centuries in some cases.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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</table>
I object to policy E5
- current rural businesses often rely on rural nature of area - that is why they are there! Whether it is artists, musicians, dog walking companies, therapy practitioners etc

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16427  Respondent: 10876033 / Lucie Paulson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy E9
- no need for district retail hubs adjacent to rural areas. People live there because they do not want retail hubs next to them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14524  Respondent: 10876033 / Lucie Paulson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy h2
- "affordable" in the Surrey context is interesting choice of descriptor. Who are we building these affordable homes for exactly? From direct experience, these homes are far from affordable, they do not house workers who will jump on the occasional bus

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16423  Respondent: 10876033 / Lucie Paulson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
I object to Policy h2
- university needs to do more to house students on campus freeing up space in Guildford town

- "affordable" in the Surrey context is interesting choice of descriptor. Who are we building these affordable homes for exactly? From direct experience, these homes are far from affordable

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to policy I1
- infrastructure not been thought through at all, evidenced by the fact that at a meeting some time ago, when I queried how the Borough were consulting with the Highways Agency, the representative said they hadn't done so yet...this should not be consultation it should be arm-in-arm working. We are talking about some areas which RELY totally on the road network.

- given there will not be real affordable homes, assume two car households for dwellings where you can expect a couple/family to life

- infrastructure needs to take into account problems on local roads, as well as major trunk routes. Both have a huge effect on people's daily lives.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am also far from convinced that the transport infrastructure has been properly thought through.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/16430</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
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- I object to policy 12
  - underestimates car usage. Ripley built over 50 units recently. Car parking is impossible now. This is because car ownership was underestimated and so new housing owners park in the car park; and because it is a disproportionately large build for the settlement (ie new house owners swamp the small village car park)

- **What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

  **Attached documents:**

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<th>Comment ID: PSLPP16/16431</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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</table>

- I object to policy 13
  - doesn't consider poor state of current rural roads with potholes, broken edges and flooding. Rose Lane in Ripley has recurring potholes, worse since HGVs coming down more regularly.
  - relying on public transport is only possible when there is a reliable regular service to multiple destinations. A bus to one or two destinations a few times a day does not actually provide for the majority of residents.

- **What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

  **Attached documents:**

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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy p1
- the Green Belt is not being protected.
- no understanding of the green belt as an asset to this area - residential, tourism, businesses
- no impact on flooding
- no impact on biodiversity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/14536  Respondent: 10876033 / Lucie Paulson  Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I object to the part under sites which include any building on the greenbelt.

- Residents' views not being taken into account, there is huge strength of feeling here. Where are these exceptional circumstances for greenbelt building?

I object to the proposals for the Wisley airfield site (site A35) - totally disproportionate in size to the surrounding settlements and too dense relative to surrounding areas. There is a real risk of "them and us" emerging given the strength of local feeling against this development. I think it could cause real unrest in the area and potential discord between new and old residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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</table>
I object to policy P3
- apparent special treatment of Council Leader's ward. Looks suspiciously like NIMBYism at the highest level.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14521  Respondent: 10876033 / Lucie Paulson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy S1, sustainable development
- no recognition of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14522  Respondent: 10876033 / Lucie Paulson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy s2
- no justification given for number of new houses needed
- no strategic Surrey wide overview of housing needs - people don't stop living and working at borough boundaries

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1675  Respondent: 10876033 / Lucie Paulson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Whilst I am sure a great deal of energy has gone into designing the online questionnaire and related events, when you stand back from it, this consultation is exclusive. The very fact that you have to write in with your comments referencing "which section, page, policy or map" you are referring to makes it very difficult for many people to comply with and therefore contribute their views. I am used to wading through papers, but to be honest I was a bit overwhelmed when I sat down to this late one evening last week.

If you stand around the village high streets and schools, you will sense and hear a great deal of fear, confusion and helplessness about large developments adjacent to small villages, in particular from those not "into" all of this. You may not receive their written views. I hope local politicians are aware of this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2878  Respondent: 10876225 / Charlotte Hawkins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a resident of Send my objections refer to the planned developments in the immediate area. Of particular concern is Garlick's Arch, Clockbarn Nursery & Winds Ridge developments.

- I OBJECT to any area being removed from the Green Belt. The Green Belt was intended to offer permanent protection from development. There are no special circumstances to justify abandoning it. The Government is breaking a manifesto pledge to protect the Green Belt.

- I OBJECT to the removal of Send in particular from the Green Belt. This means land which would previously have been unlikely to receive planning approval would now be at risk of development. It therefore paves the way for much greater development in the future in an area of countryside that should be protected.

- I OBJECT to the fact that removing areas like Send from the Green Belt will urbanise huge sections of the Borough - from Woking through to Guildford.

- I OBJECT to the fact there has been a failure by Guildford Borough Council to research and utilise available Brownfield sites before considering development on the Green Belt.

- I OBJECT to a disproportionate development in one area of the Borough.

- I OBJECT to a huge proportion of new homes in a small area
- I OBJECT to the fact that such a considerable development is being placed in an area with insufficient public transport provision nearby to encourage people to avoid using cars. Brownfield areas in Guildford near transport hubs should instead be developed.

- I OBJECT to the lack of consideration given to the increased traffic on already busy areas - eg in the centre of Ripley, and also by Tannery Lane in Send.

- I OBJECT to erosion, or development directly adjacent to, areas of protected or ancient woodland.

- I OBJECT to the lack of immediate provision for new schools or sufficient extra school places in an area that is already under pressure for places.

- I OBJECT to the lack of immediate provision for the increased pressure there will be on Doctors surgeries where there is already a significant wait for appointments.

I request my comments are shown to the Planning Inspector who will make the decision on this. Please confirm receipt of this email. If you need any further explanation or expansion of any of the comments please contact me.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1327  Respondent: 10876321 / J Montgomery  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Wisley Airfield, so called during the war, was to be put back to farm land, it is therefore not to be used for housing. If this does take place, the whole area will suffer from over crowding, the roads, high pollution levels, schools, doctors surgeries, etc. also it is a high area, very windy and not suitable for housing. We cannot cope with more traffic. The Guildford bye-pass is always at a stand still around 4.0 p.m. backing up all around. The M25 is impossible to get on to and then sometimes at a stand still as well. Trains are so full sometimes impossible to get on. How can we possibly expect to accommodate more people when we do not possess the infrastructure.

I agree we do need more housing, but this should be where they can lay new railways and roads to London and around, away from the already congested SE, or Brown field site within towns and cities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2715  Respondent: 10876321 / J Montgomery  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the amount of planning for new builds in the Ockham, Ripley and Horsley area.

Ripley has already built many new properties from flats, to larger houses and this should be included in the quotes. However, 400 new at Burnt Common and more in Send will mean Ripley Village becoming nearly a town. In filling between villages was to be prevented by the Green Belt, we should not be altering laws.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2770  Respondent: 10876449 / Michael Powell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object most strongly to Send Village being removed from the Green Belt. The requirement by th National Planning Policy Framework was for this to be permanent. Local Councillors and central government are reneging on a clear promise to protect the Green Belt and there are no special circumstances to justify abandoning it. There will be nothing to prevent developers taking advantage.

2. I object to building 45 houses at Clockbarn Nursery. Tannery lane is far too narrow to take more traffic, the existing junction with Send Road is already a danger and it is adding to the planning permission already given for 64 apartments and a Marina.

3. I object to the building of 400 houses and 7000 sq. m. of industrial space at Garlick's Arch. The site floods and there is no need for more industrial space.

4. I object to the development of 40 houses and 2 travellers pitches at Send Hill. Again the road is too narrow for additional traffic with no pathway for most of it's length. The subsoil contains unsafe landfill waste already registered with GBC.

5. I object to a new interchange with the A3 at Burnt Common. Send would then take traffic from the proposed 2000 new houses at Wisley and 2000 at Burpham. Send Road already is overloaded with heavy traffic which completely ignores current speed restrictions making the use of the narrow footpaths extremely dangerous. A survey od Send at morning and evening rush hour would evidence this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3782  Respondent: 10876449 / Michael Powell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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<td>I object to Policy A43.30</td>
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<td>I object to Policy A44.1.9</td>
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I object to the Final Draft Local Plan - our schools, doctors & roads are already FULL. We need our Green Belt in providing a Healthy Environment for us all to live in!!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO SEND VILLAGE BEING REMOVED FROM THE GREEN BELT. Local councillors and central government gave a pre-election promise that they would protect the Green Belt, they have reneged on that promise and they know that they would not have been elected if they had told the truth, as the majority of Guildford residents want the Green Belt preserved. The Green Belt was intended to be permanent, as required by the National Planning Policy Framework, and their are no special circumstances to justify abandoning it. The Green Belt is there to prevent villages from merging into each other, to prevent over-development and to keep the rural aspect of the environment. The villagers of Send do not want their village to become an over populated urban sprawl.

I OBJECT to building 45 houses at Clockbarn Nursery because of the sheer volume of traffic that will be created, Tannery Lane is narrow and winding and access in inadequate. Not only that but the junction with Send Road is already hazardous. Planning permission has already been granted for 64 apartments and a Marina, which means even more traffic will be generated.

I OBJECT to building 400 house and 7000 sq metres of Industrial space at Garlics Arch, opposite Send Marsh Road. This area contains Ancient Woodland which should be protected as it is irreplaceable. Brown Field sites should be used for the houses and Industrial buildings should be built at Slyfield. GBC have grossly exaggerated the housing requirements, and refused to explain where they got their numbers from.

I OBJECT to development of 40 houses and 2 travellers pitches at Send Hill, This lane is very thin with inappropriate access. The land is a former landfill site, and contains unsafe waste, which is well documented. This is also an exceptionally beautiful part of Send Village which would be spoilt.

I OBJECT TO the A3 interchange as this would cause excessive traffic to come through Send, which is already overloaded with heavy traffic at all times of day, not only rush hour, this would cause terrible traffic jams and gridlock, and vehicle fumes and noise would be detrimental to the health of the villagers.
I OBJECT to the proposal to inset Send Business Park from the Green Belt because:

- It is effectively an old non-confirming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation.
- There is highly restricted vehicular access along Tannery Lane in both directions.
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I strongly object to Guildford Borough Councils draft Local Plan proposal to build 1800 houses, an industrial park and a highway on the slopes of the Hogs Back at Blackwell Farm.

I have lived in Wood Street Village all my life, from 1945, and have chosen to stay here, as have my three married children and their families, because it IS a true village - in the sense that it is separated from the suburbs of Guildford by beautiful common land and therefore retains its own identity. Building at Blackwell farm and surrounding areas will only create a 'joining up' of the present gap.

The Hogs Back ridge is known for its wonderful views of surrounding countryside and is an designated Area of Outstanding Beauty - this would be destroyed along with many acres of scenic farmland and ancient woodland.
I remember when Blackwell Farm WAS a farm in the true sense, owned by Mr Brock and wish that it had never been sold to the University, who seem to have a complete disregard for anything other than their own needs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslpl72/91  Respondent: 10876545 / Richard Grimmond  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6777  Respondent: 10876705 / Olive Edwards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A15

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A15 - land at Guildford Cathedral

This site was designated Protected Open Space in 2003 for good reason and I would say that it is even more important now to keep this area as a green space as every town needs to have several open spaces, particularly in light of current Government housing policy and the excessive degree of development in Guildford since that time.

A change of status would impact on the local community in terms of its local character, particularly for roads such as
Ridgemount and Arlesford Road which currently have a semi rural feel to them as they are bounded by the ancient historic tithe hedge which forms part of the currently designated open space, as well as the visual quality of the site. The setting it provides for the Cathedral and the views of the Cathedral throughout Guildford as a whole ("a jewel in an emerald sea") will be irreparably damaged. I would therefore question the rationale for this change which seems to be based purely on the Cathedral's proposal to develop the site. It is evident that this site is not appropriate for building as due to its nature and history of problems relating to subsidence and drainage, extensive piling would be required to accommodate any development with consequent repercussions on neighbouring houses in roads such as Ridgemount, Arlesford Road, Benbrick Road, Stag Hill, Scholars Walk etc. Furthermore the rainwater run-off from the site has caused drainage and minor flooding issues, particularly affecting Ridgemount, which would be exacerbated by further development. It would seem that the reason for change of status is political rather than based on the suitability of the site for housing, which it is plainly not.

There is a well-documented major traffic problem in this area already which is only going to be made worse by the current proposals for development of Guildford Park Car Park and Guildford Station. The addition of 100 houses on the Cathedral hill site will add in excess of 100 vehicles to this already problematic scenario as well as having wider implications for the immediate infrastructure of the neighbourhood.

In view of the vote to leave the European Union the housing need for Guildford is likely to change in the near future and alteration of the current status of the site in question may well turn out to be a hasty decision to be later repented at leisure.

In summary I object to the change in status of this site to C3 housing on the grounds that it is inappropriate for development due its nature and any development would have a negative impact on the surrounding community both in terms of impact on the setting of the cathedral and the local infrastructure. I sincerely hope that you will take these points into consideration during your deliberations on the status of the Cathedral hill site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** pslp172/3503  **Respondent:** 10876705 / Olive Edwards  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A15

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I am writing as a result of the changes that you are proposing to make to the Proposed Submission Local Plan: Strategy and Sites (2017) regarding the Guildford Town Centre Site Allocation A15 Land at Guildford Cathedral, Alresford Road, Guildford listed on page 142 and detailed on pages 176 and 177.

The proposed new wording in point 6 is open to too many interpretations and can be used to justify particular decisions rather than giving specific direction. The use of the word "unacceptable" lends itself to subjective rather than objective conclusions. The ancient tithe hedge running along Ridgemount and Alresford Road should be protected at all costs as should all the trees with tree preservation orders on them, as well as other significant trees and hedgerows. The proposed new wording puts these at some consideration risk.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
My wife and I have lived in West Horsley for a combined 35 years and we wish to provide you with our comments on the Local Plan.

Overall, while we accept that more houses need to be built in the Guildford Borough, we believe very strongly that the Proposals are way beyond what is reasonable and will place an enormous strain on the existing infrastructure in East and West Horsley.

For example, to highlight just a few EXISTING INFRASTRUCTURE CHALLENGES:

- It is already impossible on occasions to find a parking place at Horsley Station and Effingham Station on a work day. There is no public transport available as an alternative to get to the Stations.
- Driving along the B2039 between the A246 and the centre of East Horsley village is already often very difficult with the large number of wide vehicles and part of the road is only wide enough for one vehicle, requiring lorries frequently having to drive along the pavement. The pavement is itself narrow in parts and we know of pedestrians who have been hit by passing vehicles.
- The Horsley Medical Practice is already at over-capacity.
- Car parking within East Horsley is already at capacity and there appear to be no alternative sites for car parking allocated or available.

GENERAL COMMENTS

- We agree with the response from East Horsley Parish Council – EHPC Response to GBC Local Plan – which has already been sent to you.
- We believe it is wrong to remove the villages from the Green Belt. We moved to Horsley and brought up our family here in order to live in a Green Belt area. If that is removed, we will never get it back either for existing residents or future generations.
- It is wrong to enlarge the village boundaries.
- It is completely wrong to plan for up to 533 new houses in the Horsleys.
- The proposed development of Wisley with 2,068 houses has been long debated. We object to the proposed development there as it would generate an enormous amount of traffic in the Horsley area and create even more pressure on the existing infrastructure. Again, beautiful countryside will be lost to development.
- It is wrong that 65% of new houses in the Borough will be built in the Green Belt – the Council must find more appropriate sites.
- If this Local Plan is approved, the Horsleys will become just another area of concrete and buildings in a continual stretch of development from London and to the south west beyond the M25. This will result in more pollution and lower quality of life for existing and future residents.

We look forward to hearing in due course that the proposed Local Plan has been thrown out – as the vast majority of residents in the Horsleys wish to happen.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPA16/27  **Respondent:** 10876833 / J. C. ROBSON  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I am writing to you to object to Policy P2: I object to Send village and its surroundings being removed from designated greenbelt.

I also object to Policy A 43 to build additional housing at Garlick's Arch and Burnt Common.

I also object to Policy A 44 additional proposed housing west of Winds Ridge and Send Hill.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/86  **Respondent:** 10876833 / J. C. ROBSON  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

All of the above would impact Send's infrastructure significantly. This infrastructure is already fully maximised. We are already experiencing traffic congestion daily through Send and surrounding areas. Schools would be impacted, schools that have limited places already. The Villages Medical Centre is already extremely busy with about 2 weeks notice needed to book appointments with GPs.

Any additional housing on this scale will increase road congestion, the impact on schools and the surrounding medical facilities. All social care facilities would be impacted.

This proposal would increase pollution and noise which is already substantial from the A3. Reduce our country side and influence and impact its inhabitants significantly. We are trying to teach everyone, including our children, to preserve the environment, help reduce pollution and not to increase the impact on our greenbelt. This housing proposal would have the opposite effect.

I am a resident near the Burnt Common roundabout and drive through Burnt Common several time a day. It is congested, busy, any additional traffic would make the situation much worse and impact our village negatively. Garlick's Arch and the woodland surroundings serve as a buffer to the A3, removal would bring the A3 into the village, there is no benefit from this for local residents. We do not want more traffic, noise, pollution. We live in a village because we want to be surrounded by countryside. Countryside that has been there for hundreds of years and should be enjoyed by many generations to come.

I object in the strongest possible way to the above policies, the additional housing proposed in Burnt Common, Garlick's Arch, Send Hill and Winds Ridge and the removal of Send from greenbelt.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1849  Respondent: 10876833 / J. C. ROBSON  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object in the strongest possible way to the Policy A42 change at Clockbarn in Tannery Lane because:

- The change represents an increase of 33% in homes and this is excessive for the area
- It ignores the hundreds of objections made by locals previously
- Further increase in housing development will impact the traffic problems in the area. Traffic on the A247 junction is already an issue.
- Further increase in housing development will impact the Green belt.
- Further increase in housing development will change the character of our village for the worse.
- Further increase in housing development will impact the views from the River Wey Navigation.
- Further increase in housing development will impact the local school. More places will be required in a school that has little capacity.
- Further increase in housing development will impact local health care. The Villages Medical Centre is already maximised and can’t deal with more demand.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1847  Respondent: 10876833 / J. C. ROBSON  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object in the strongest possible way to Policy A43 change at Garlick’s Arch because:

- It ignores the thousands of previous objections from the local population.
- There is no proven demand for Travelling Showpeople plots in this location.
- This area is a beautiful Green Belt area with many mature trees from hundreds of years ago. No exceptional circumstances exist.
- An area where wildlife and plants can grow preserving our heritage.
- It is land between the A3 and the village and protects the local residents from noise and pollution from the A3.
- Green Belt is part of our village setting, it is what makes our village a village. Send residents live in a village as this is the setting Send offers: living close to protected Green Belt and not in a town.
- 400 homes and 6 Travelling showpeople plots will impact the village character of Send. Woking and Guildford are nearby to offer town amenities if required. The proposed 400 homes and 6 Travelling Showpeople plots are an excessive increase to Send / Ripley and this will result in overpopulation with more traffic impacting local roads and village.
- The area around London Road / Roundabout at Shell Garage / Portsmouth Road / A247, already has high levels of traffic in all directions, not just at peak times in the morning / evening but throughout the day / night.
- This area is particularly congested between 7:15 - 9:00 AM and 16:30 - 18:30 mainly by passing through traffic, impacting the local area. These roads serve as an alternative to the A3 leading to this congestion. Often the traffic is standing still during these hours.
- The proposed 400 homes and 6 Travelling Showpeople plots will impact traffic on these roads. These roads / junctions are unable to cope with more traffic. This will require more funding to rectify and impact locals with ongoing road works.
- The proposed 400 homes and 6 Travelling Showpeople plots will impact the local schools - the local Send school has just been extended and does not have sufficient capacity for more. This will require more local funding.
- The proposed 400 homes and 6 Travelling Showpeople plots will impact healthcare. The Villages Medical Centre does not have sufficient capacity at present, let alone for a substantial increase in residents. This will require more local funding.
- The proposed 400 homes and 6 Travelling Showpeople plots will impact local air quality, water resources, ground pollution. Wildlife and flora are impacted. As the land is so near the A3 health for residents could be affected by asthma etc.
- The proposed 400 homes and 6 Travelling Showpeople plots will impact the flooding situation in the area. The area is already suffering from flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/1848  **Respondent:** 10876833 / J. C. ROBSON  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**I object in the strongest possible way to Policy A58 change at Burnt Common because:**

- It was deleted from the 2014 draft due to multiple previous objections.
- The work minimum is a change from the previous maximum in the 2016 plan. Since then there has been a decline in the demand for industrial land.
- Slyfield/Guildford has vacant sites to accommodate industrial / warehouse demand.
The 2017 Employment Land Need Assessment shows a reduction in demand so no need to develop Burnt Common site.

The proposed industrial / warehouse development will impact the Green Belt of the villages Send / Ripley. It will change the character of the villages and not preserve the heritage and Green Belt of this area.

The proposed industrial / warehouse development will impact local traffic. The roads around the Shell garage roundabout are already severely congested and this development will impact this even further. The U-turn on London Road near the proposed site is already dangerous, accidents have occurred as the traffic coming from the A3 onto the London Road is travelling at minimum 50 mph. The proposed industrial / warehouse development will increase traffic on this junction.

The proposed industrial / warehouse development will impact noise in the area. Noise is already an issue being so close to the A3 and the London Road / A 247 itself are noisy with traffic. Lorries parked on the London Road are already contributing to this noise day & night.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: pslp171/564  Respondent: 10876833 / J. C. ROBSON  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object in the strongest possible way to the Policy 2 at paragraph 4.3.15 change

I object to the proposal to inset Send Business Park from the Green Belt because

- It is non-confirming user in an area of outstanding countryside directly next to the beautiful Wey Navigation.
- There is vehicular restriction along Tannery Lane in both directions
- Further development will impact the Green Belt and the openness of the area
- Further development will impact the character / heritage of the village
- Further development will lead to increased traffic in the area, an area that is already severely congested
- Further development will impact flora and fauna in the Green Belt
- Further development will increase noise levels in the local area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLP16/4226  Respondent: 10876897 / Norman and Morag Evans  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
Lack of infrastructure and traffic implications - I OBJECT

The addition of nearly 14,000 extra homes and 25,000 to 30,000 people has very serious implications for infrastructure and traffic, which the Plan hardly addresses and for which there is little funding (if any) - schools, medical centres, drainage, sewerage and so on, but particularly roads. The impact of Brexit is yet to be fully felt, but will almost certainly limit public funding even further and developers will be reluctant to commit to new developments in an uncertain market.

If the Plan is implemented, it will lead to an increase of around 25,000 to 30,000 vehicles, plus extra traffic generated by developments in other boroughs and by normal traffic growth. The borough’s roads are already overcrowded at particular times and many are in a state of poor repair. Moreover, away from the main arteries, the back roads are often little more than lanes - narrow and with no pavements. For them to safely accommodate all the extra traffic, there would need to be many road changes and adjustments, requiring more road furniture, pedestrian crossings, traffic controls and so on, all having a detrimental impact on the character and nature of our environment, aside from costing a huge amount.

The borough’s main artery, the A3, suffers considerable congestion now, particularly on the southern approach to the town’s turn-off, southwards at the hospital exit, and northwards at the junction with the M25, where pollution levels often exceed permitted levels. The Plan proposes more access to and from the A3 with a four-way junction at Burnt Common and further access at the Wisley junction (see item 6) to accommodate traffic from proposed new developments. These will only increase the number of vehicles using the road, adding excessive traffic levels, increased congestion and pollution.

(There has been talk of building an A3 tunnel under Guildford, but this is a pipedream with no realistic prospect of ever being built, especially because of the huge cost, for which there is no planned funding.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4225  Respondent: 10876897 / Norman and Morag Evans  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1)  

1. Before going into detail, I would like to preface my comments with some general observations about the whole process. It is widely recognised that the country’s economy is out of balance and that too much business activity and supporting population is concentrated in London and the South East. It seems perverse, then, to exacerbate the problem by creating excessive development in the South East, putting further pressure on the region.

2. There are other factors and constraints that need to be considered, especially the impact of Brexit on population figures and infrastructure funding, and the possibility of a third Heathrow runway, which would result in an enormous increase in traffic in the area. In addition, the Royal Horticultural Society is planning a major re-
development of its headquarters at Wisley which will result in more visitors and traffic, putting further pressure on the A3 and nearby intersections. An increase of 25-30,000+ in the local population would cause intolerable strain on the Royal Surrey County Hospital, itself already under pressure.

3. The borough of Guildford is not an ‘island’. Development within the borough has impacts on surrounding boroughs and areas in terms of traffic, housing demand, infrastructure and so on. The reverse also applies. The piecemeal approach of the Local Plan process means there is no strategic planning, covering a much wider area, including London.

Taking just one example, the A3 serves a number of boroughs throughout its length and any development planned along its route by other boroughs will have a major impact on Guildford borough. To this extent, the entire process is flawed.

2) Housing Assessment - I OBJECT

The Housing Minister Brandon Lewis has been quoted as saying: ‘Picking housing numbers out of thin air and imposing them on local communities builds nothing but resentment’. It is a pity GBC failed to hear him.

The Local Plan is formulated on an SHMA which has been based on a methodology unknown and unscrutinised, even by the Council. It is complete folly, therefore, to produce a ‘plan’ on such a basis. Moreover, it has been produced by an outside company which is part of a major property and development business, thereby negating its objectivity.

The figure of 693 homes per year is substantially higher than the 2014 assessment and more than double that of the 2003 plan. Further doubt about the accuracy of the figure arises because of the Council’s previous actions in relation to the South East Plan. GBC made a successful legal challenge against the then Government’s proposal for 422 homes per year but now vigorously promotes 693 homes per year. At the time of the legal challenge victory, a senior Councillor said: ‘Our successful challenge means that local concerns have now been heard and taken into account when planning the future of our borough. …It is reassuring that the South East Plan housing targets which many felt would have prejudiced the character of the borough no longer apply.’ Why is the Council not hearing the local concerns now and why is it not fearful of a massive change in the character of the borough with such a high SHMA?

Furthermore, the SHMA is increased by GBC to give a population increase almost 70% higher than official ONS estimates for population growth in the borough. This, for example, results in an increase of 35% in existing West Horsley households. At present, there are 2,808 homes in both East and West Horsley: if the Plan is accepted as it is, there will be AN EXTRA 5,000 homes within five miles, including 600 in the Horsleys. Overall, the Plan proposes more than 8,000 new homes in the Green Belt but only about 1,100 in the Guildford urban area.

It is generally recognised that there is a chronic shortage of social housing and of one or two bedroomed properties for sale or rent in the borough. Moreover, there is a need for homes, particularly bungalows, for elderly people wanting to downsize and stay in the area. There appears to be nothing in the Plan to address these issues, except the aspiration for 40% affordable homes in the larger developments. With the current level of house prices in the borough, it is doubtful that many would-be buyers would be able to afford an ‘affordable’ property or an ‘affordable’ rent. Also, developers are renowned for using their ‘get-out card’ to avoid building ‘affordable’ homes. There appears to be a serious mismatch between the housing need and where and how it could be met. Rather, the Plan simply gives a green light to developers to build all over the Green Belt and to plan for future ‘easy’ growth.

The unjustified and inflated housing figure will cause unacceptable pressure on local infrastructure and result in a complete change in the character of the borough. The Council appears to be ‘going for growth’ for growth’s sake, ignoring its own past views as well as those of current residents. Overall, its Plan would ‘urbanise’ the borough, extending the sprawl of London and its suburbs to Guildford and beyond. To minimise the need for huge infrastructure developments, most housing growth should be accommodated within Guildford itself, leaving the borough’s villages to grow organically.

In its desire for ‘forced growth’, GBC has utterly failed to consider the constraints to development and the SHMA figure, such as the Green Belt and need for infrastructure, which if employed would result in a much more realistic and sustainable scale of development and one in keeping with the borough’s character.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The University of Surrey - I OBJECT

Every university has a basic duty to provide as much accommodation for its students as possible. Surrey University already has planning permission for a thousand or more housing units for student accommodation and has other land in its campus which could be used to house its students. If the University implemented its permission and built further accommodation, it would release thousands of housing units in the town for ordinary residents. Its proposal for building on Blackwell Farm is opportunistic and profit-seeking, destroying Green Belt land on Hog’s Back, a well-known scenic attraction. A recent independent survey has concluded that the Blackwell Farm site should be included in the AONB: I agree.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7828  Respondent: 10876897 / Norman and Morag Evans  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

‘New town’ at the former Wisley airfield - I OBJECT

The former Wisley airfield is entirely unsuitable for use as a new ‘town’. The site was requisitioned by the Government for wartime purposes with a promise that it would be returned to agricultural use in due course - that promise should now be honoured. The land is Metropolitan Green Belt land except for about 15% consisting of the old concrete runway and apron.

A planning application for temporary use of the site for filming was rejected in 2014 and later refused on appeal, the Inspector stating that the development would be detrimental to the Green Belt and would likely cause harm to local environmentally sensitive sites. A much more substantial planning application for a small town of some 2,100 homes, medical centre, schools and supermarket was last year submitted by the owner, Wisley Property Investments, but was recommended for refusal by the Council officers and then rejected unanimously by a special meeting of the Planning
Committee, who totally agreed with the 14 main reasons for refusal by the officers. I will not list all the reasons here because the Inspector will have access to the Council’s files, but my objections include:

- loss of Green Belt
- loss of good quality agricultural land
- danger to nearby environmentally protected sites
- totally unacceptable traffic problems, including dangerously high pollution
- no infrastructure and no transport links (except A3)
- overdevelopment and unacceptable housing density
- five-storey buildings, totally out of keeping with the Surrey countryside
- detrimental impact on Surrey skyline and increase in light pollution.

I will emphasise the traffic problems this development would cause. Some 4,000 cars would be added to the area’s roads, causing more congestion on the A3 into Guildford and at the junction with the M25 (J10), where pollution levels often exceed permitted levels already and are too high to allow schools to be built on the site. The proposed new A3 junction at Wisley would have to accommodate a large increase in traffic from all directions, while Ripley and East Horsley would be seriously affected.

The fact that the scheme involves local road closures and one-way streets is a clear demonstration of how impractical the scheme is.

The Council’s comprehensive rejection of this scheme renders any large-scale development of the site out of consideration: it is not practical, viable or sustainable. Indeed, the Council’s Leader and Lead Councillor for Planning said the scheme failed the Council’s sustainability test ‘dismally’. Why, then, has the Council not removed the site from the Local Plan which would be logical in light of its fundamental unsuitability? I merely point out that Wisley Property Investments has links to the Conservative Party, including its ‘front man’ who happens to be the lead councillor for planning for the Conservative-controlled Vale of the White Horse District Council in Oxfordshire.

The site should continue to be used for agricultural purposes, while the runway and apron could be used for a solar farm or for hydroponic horticulture (no need to remove the eight-foot deep concrete at great expense).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPP16/17258</th>
<th>Respondent:</th>
<th>10876897 / Norman and Morag Evans</th>
<th>Agent:</th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E8</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
East Horsley ‘District Centre’ - I OBJECT

The Plan proposes to designate Station Parade, East Horsley, as a ‘district centre’ which would make it vulnerable to future urban development. This is an impractical proposal since there is nowhere for any development to be built without the destruction of existing homes and premises. I also object to the inclusion of Kingston Field as a site for possible development. This is a very important local space and a valuable community asset which should remain untouched.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17257  Respondent: 10876897 / Norman and Morag Evans  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Destruction of the Green Belt - I OBJECT

The ruling party on GBC has acted dishonestly and dishonourably over the Green Belt. Having promoted its protection at every election for decades and made the same pledge last year, it now claims it has ‘listened’ to the people of Guildford, yet produces a plan barely different from the 2014 version but which includes widespread development - TWO-THIRDS of which is on Green Belt land. This is contrary to their own policies, those of central Government and those of the NPPF. The Council even has the gall to include in its Plan the sentence: ‘We will continue to protect the Green Belt’!

The new Plan also includes removing about 15 villages in the borough from the Green Belt and changing the Green Belt boundaries. There is no justification for this except to facilitate future development. Removing Green Belt status from villages will leave them vulnerable to excessive development and result in the merging of villages causing an ‘urban’ sprawl, exactly the outcome the Green Belt was designed to protect.

At the last General Election, the Tories’ manifesto promised to protect the Green Belt and to retain the rules governing it. These state that development can only be allowed on Green Belt land in exceptional circumstances and that housing need does not count as sufficient reason. They also say that Green Belt boundaries cannot be changed or moved, again except in exceptional circumstances. GBC have not given a single reason why there are special circumstances for sacrificing so much Green Belt land. Why do they think that the rules do not apply to GBC, especially when only a few years ago they made a legal challenge to protect the borough’s Green Belt?

The Plan’s totally unacceptable assault on the Green Belt will, in effect, destroy the concept of protection throughout the borough and beyond. It must be resisted if we are to retain the sort of countryside that the British know and love - and want retained.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17259  Respondent: 10876897 / Norman and Morag Evans  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

IN CONCLUSION

The 2016 Plan is completely unacceptable. The Council has totally ignored the comments and suggestions of residents and proceeded with an outrageous assault on the Green Belt for which they have absolutely no mandate - in fact, the very opposite. The housing target is excessive and needs to be seriously reviewed, especially in light of Brexit, and a new plan needs to emerge based on actual housing needs with the right kind of accommodation in the right places, and a plan that requires the least amount of infrastructure developments. If the current Plan proceeds, it will lead to massively increased traffic congestion and pollution levels, require a huge amount of public expenditure, and destroy the character and beauty of an attractive and much-loved area.

Above all, we need a Plan that supports local needs and not the balance sheets of developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SLP16/1923  Respondent: 10876897 / Norman and Morag Evans  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Guildford Borough Council’s Local Plan on the grounds that it represents serious overdevelopment, is based on inaccurate, unscrutinised housing figures, and means a massive, unacceptable destruction of Green Belt land. It would also require a huge amount of infrastructure and attract thousands of extra vehicles, placing undue pressure on local road networks, as well as causing extra pollution.

Furthermore, it would completely change the character of the borough, harm the environment and seriously damage the quality of life for residents. As our local MP has said, the Plan is ‘not fit for purpose’.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3626  Respondent: 10876897 / Norman and Morag Evans  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. One of the most unacceptable elements of the Local Plan is the continued proposal for a new ‘town’ on Three Farms Meadows, the former Wisley airfield site. The real question is: why do the Conservatives still press for this totally unsustainable development, when it has been comprehensively shown that it is impractical, will cause massive problems without solving any, and will overwhelm local roads and villages.

   a) The vast majority of the site is Green Belt land and good quality agricultural land at that. The planning application for a new ‘town’ was thrown out by the Council’s professional planners who cited 14 compelling reasons for refusal, a decision upheld by the Planning Committee whose elected councillors voted unanimously against it.

   b) In a report for the Council, consultants AECOM considered the sustainability of the larger proposed sites for development in the Plan and concluded that the Wisley site was the least sustainable, awarding it eight red flags. Yet in arriving at the 2017 Plan, the Council removes a site near Normandy and Flexford, rather than the Wisley one, even though it scored better for sustainability.

   c) The Wisley site has a questionable history involving Conservatives and their supporters and backers. It was bought by Wharfland Investments who wanted to build a green recycling centre there. Its directors included a former Conservative cabinet minister, a property developer and a Conservative lead councillor for planning for an authority in Oxfordshire. Around 2012 when Guildford decided to earmark the site for possible development, Wharfland went into liquidation and the Wisley site was sold to Wisley Property Investments, a company registered in the Cayman Islands tax haven. A coincidence? Because of the secrecy surrounding tax havens, it is not possible to identify the company’s directors, but for the past few years the Oxfordshire councillor has been acting as the front-man for Wisley Property Investments. It is also believed that the development is being supported by a hedge fund manager with possible links to the Conservative party. A public inquiry into the refusal of planning permission is due to be held in September, after which it will be called in by the Communities Secretary, a Conservative, of course.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1802  Respondent: 10876897 / Norman and Morag Evans  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. The contentious Strategic Housing Market Assessment (SHMA) has been slightly reduced but still remains excessively high without proper justification. The Council has consistently refused to reveal the methodology used by consultants with links to the Government and an involvement in planning, so it is impossible to see how the figure has been arrived at or to question the methodology. This is not only secretive but also antidemocratic. Since the people of Guildford are ultimately paying for the report, it is a scandal that they have been denied the right to scrutinise it.

   a) Even taking account of Brexit, the consultants have chosen the highest estimate for population increase, representing a 22% rise in housing stock while the ONS predicts only a 10.4% increase. Brexit and other related uncertainties make any forecasts highly unreliable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1804  Respondent: 10876897 / Norman and Morag Evans  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan has huge deficiencies in infrastructure provision and investment, particularly in transport. The proposed provision of more than 12,000 homes will put undue pressure on already crowded roads, schools and medical facilities. How can a relatively small, northern part of Surrey absorb some 40,000 new inhabitants without causing chaos and ruining the character of the neighbourhoods? Add in the thousands and thousands of extra inhabitants in all the other northern Surrey boroughs, as proposed in other Local Plans, and the whole area will be completely swamped, overdeveloped and snarled with traffic, making it just an extension of urbanised Greater London. It is irrational to look at one borough as if it were an island and ask it to design a Plan for what it sees as its needs without considering the impact of demands and pressures from all surrounding areas and vice versa. Consider in full the impacts, for example, on the A3 and M25. That is why the entire Local Plan exercise is so fundamentally flawed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1803  Respondent: 10876897 / Norman and Morag Evans  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
2. One of the most glaring errors in the Plan is the total disregard for planning constraints, in particular the Green Belt. This is a matter of major concern to Guildford residents, as shown in the responses to the earlier versions of the Plan.

a) Guildford Conservatives have acted shamefully and undemocratically, deliberately lying to the Guildford electorate in order to retain power and proceed with their development-led Plan. In the 2015 local elections, they produced campaign material making vows and pledges to ‘save the Green Belt’, yet as soon as they were returned, they produced the then new version of the Local Plan which envisaged nearly two-thirds of all proposed development on Green Belt land. It is utterly disgraceful. Even now, after a consultation which saw the Council again lambasted for its proposed destruction of the Green Belt, this latest version proposes development of nearly 60% of new housing on Green Belt land.

b) Earlier this year, the Communities Secretary described Green Belt land as ‘sacrosanct’. The then housing minister also used the phrase and added in a television interview: ‘There is no need to build on large tracts of Green Belt land’. Why is it, then, that Guildford Conservatives have turned a deaf ear? And why is it that trust in the Conservatives is at an all-time low?

c) There is no justification for removing the Horsleys and other villages from the Green Belt. The Horsleys, in particular, represent a Green Belt line of defence against further outward development outside the M25. If these and the other development proposals are allowed, there will be almost continuous development from outer London all the way to Guildford, Woking and even beyond. The removal of the Horsleys from the Green Belt will increase development, destroy openness and result in the loss of character and diversity. Moreover, the proposed Green Belt boundary changes in East Horsley will result in similar losses, while increasing the settlement area by an unacceptable 37%.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp17q/332</th>
<th>Respondent: 10876897 / Norman and Morag Evans</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?</td>
<td></td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford Council’s 2017 Local Plan is little different from the previous versions, showing again that the Council does not listen to the people it is supposed to represent and arrogantly pursues a damaging trajectory for unjustified overdevelopment of a beautiful borough.

We strongly object because the Plan is based on unknown and unscrutinised methodologies, involves widespread destruction of the Green Belt, makes no provision for planning constraints, is woefully short of infrastructure provision and investment, and will ultimately destroy the character and beauty of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/139</th>
<th>Respondent: 10876961 / Geoffrey Willot</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I object – traffic will join narrow road, single vehicle width at one point, and then add to traffic with cars parked on roadside at junction with A247.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object – 

1) This is land is Green Belt - designed to prevent sprawl and the merging of settlements. No ‘exceptional circumstances’ have been claimed – indeed there has been little time to address this or the other issues below. This site was not in the 2014 Section 18 original draft Local Plan, nor in the revised Section 19 Local Plan in April 2016, and appeared just thirteen days before the Council met to recommend consultation – a poor way to make significant decisions.

2) The development is too large – the proposal for 400 homes plus light industrial facilities represent an increase of about a quarter the size of Send village. People living there will use the Send schools and the Send-based Villages Medical Centre which serves Send and Ripley. These are currently working at capacity. 400 homes at Garlick’s Arch would provide too many patients and pupils for present arrangements, and not enough to make feasible the building of a new school or new medical facilities.

3) Congestion - The proposed new links to the A3 would mean a large increase in traffic through Send and at the Burnt Common Roundabout; these road are already jammed at times. It is claimed that it is not permitted to link the Garlick’s Arch site directly to the A3, so traffic to and from the site would use the narrow Burnt Common Lane, the Portsmouth Road, Burnt Common Roundabout and the A247 Clandon Road before accessing the new links, hugely adding to local traffic. Even if the direct link to the A3 could be made, MANY vehicles from Garlick’s Arch traffic would be bound to use the A247 through Send to Woking, going through Burnt Common Roundabout.

The A247 and Burnt Common Roundabout are already gridlocked at busy times; any further traffic would cause significant delays for longer periods, and consequently higher levels of traffic pollution ( diesel particulates, carbon monoxide and oxides of nitrogen ).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4773  Respondent: 10876993 / Michael Hurdle  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object – Land in Green Belt; resulting traffic using Send Hill which has single track road in one direction and the busiest junction in the village in the other, adding further pressure to traffic. There are concerns over the safety of landfill waste in the ground.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12042  Respondent: 10876993 / Michael Hurdle  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ()

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>Policy P2 - Green Belt</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>I object</strong> – to the proposed insetting of villages from the Green Belt, and the green light given to infilling. This means to villages are open to development as well as the allocated sites. Green Belt protection is national policy – its protection was strongly promoted by national political leaders in the 2015 General Election and by most candidates, including those of the majority party in Guildford, in the 2015 Local Elections.</td>
</tr>
<tr>
<td>Appeal case law has shown that even if housing need does exist, that does not automatically over-ride the protection accorded by the Green Belt legislation.</td>
</tr>
<tr>
<td>Guildford B.C. claims that less than 2% of Green Belt will be lost, but factoring in the insetting of villages, the figure appears to be nearer 6%.</td>
</tr>
</tbody>
</table>

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/12040</th>
<th>Respondent: 10876993 / Michael Hurdle</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ()

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>Policy S1 - Presumption in favour of sustainable development</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>I object</strong> – The policy fails to accept the current infrastructure deficit, principally though not exclusively concerning roads. The plan does not appear to have to have had the permitted ‘Constraints’ applied; in this area, Green Belt and already gridlocked roads could and should have been used to constrain the target for building homes.</td>
</tr>
<tr>
<td><strong>Local Concentration</strong> - It is proposed that just five sites (A25, A35, A42, A43, A43, A44) will deliver nearly half of Guildford’s new homes – these sites are concentrated in a tight cluster of adjacent villages, (Burpham, Clandon, Send, Lovelace (Ripley), Horsley,) putting enormous strain on transport and social infrastructure in a small area.</td>
</tr>
<tr>
<td><strong>Impossible infrastructure</strong> - The Council claims that all development is predicated on the delivery of new infrastructure. New links may well improve roads such as the A3 itself, but there is no conceivable improvement which could be made to any road joining the A3, e.g. the Burnt Common area, when the entire purpose is to attract more traffic at these points.</td>
</tr>
<tr>
<td>It is pointless to rely on an infrastructure which it is physically impossible to deliver, at any level of funding.</td>
</tr>
</tbody>
</table>

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
### Comment ID: PSLPP16/12041  Respondent:  10876993 / Michael Hurdle  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**Policy S2 - Borough wide strategy**

**I object** – The calculation that 13,860 homes are required is based on a calculation made by a sub-contractor who will not share the basis of the calculation, citing commercial confidentiality. Wrong in principle – government should be open and transparent; important data should be open to give public confidence that it is accurate, based on sound assumptions, and free of commercial bias.

**SHMA Accuracy doubtful** - In Dec 2014, the House of Commons and Local Gov. C’tee was critical of the accuracy of SHMA processes, noting (section 69) that repeat calculations of an area could yield different results.

The method of calculating the population of a town with many foreign students also distorts the population total.

**ELNA** - The Employment Land Needs Assessment 2015 indicates that Guildford does not need a large increase in employment space, which suggests that such housing as is needed could largely be built on Brownfield sites.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: pslp172/2573  Respondent:  10876993 / Michael Hurdle  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**A42 Clockbarn Nursery, Tannery Lane, Send**

**I OBJECT** to the proposed increase to 60 homes. This would add traffic not only to the A247, but also within Tannery Lane, which is narrow and without pavements, and has a poor narrow junction with the A247.

**A 58 Land at Burnt Common, London Road, Send**

**I OBJECT** to the change for a **minimum** of 7 000 square metres of light industrial, general industrial and storage & distribution (previously a **maximum** of 7 000 square metres, transferred from Garlick’s Arch)
This land is zoned permanent green belt. The Employment Land Needs Assessment (ELNA) 2017 shows a reduction in demand from 2016 in the Borough of Guildford. Industrial processes (B2) and wholesale warehousing and distribution (B8) are not regarded as suitable for the green belt. Slyfield and Guildford have unused industrial space.

The land being sought at Burnt Common could hold around seven times this minimum. This vague, open-ended proposal is inappropriate in a Local Plan.

Developments in this area rely on road networks which are already over-stretched; the A3, the B2215 from Ripley to Burnt Common, and the A247 from Clandon through Send towards Woking, which all suffer frequent congestion. The new proposals make this worse.

A25 Gosden Hill Farm, Merrow Lane

I OBJECT to the new proposal for an employment area to the north to deliver an HQ building of 7 000 square metres. This will add more traffic to the A3 and A247 which are already highly stressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

To remove the three policy aspects listed above.

Attached documents:

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Policy P2, Green Belt

I OBJECT to the statement 4.3.15 which states that 14 villages are ‘now inset from the Green Belt’ – factually untrue, as no decision has been made. These villages are at present actually in the Green Belt.

I OBJECT to the proposal to remove Send Business Park from the green belt. Tannery Lane is narrow – single track in places – in both directions. The lane lacks pavements. There is already planning permission for a marina and it will be dangerous to stress the road further.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Rectify the inaccuracy of the text.

Withdraw the proposal to remove Send Business Park from the Green Belt.

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S2 Planning for the Borough

I OBJECT to the new target of 12,426 homes as there have been no constraints applied as required by the NPPF, especially the need to demonstrate ‘exceptional circumstances’ for building in the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Apply appropriate constraints.

Attached documents:

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Comment ID: PSLPS16/8206  Respondent: 10877025 / Maureen Stephens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic fr

[note: text was incomplete when received]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/18479  Respondent: 10877025 / Maureen Stephens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1).

This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/18478  **Respondent:** 10877025 / Maureen Stephens  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to not protecting the Green Belt (Policy P2).

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43).

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/18480  **Respondent:** 10877025 / Maureen Stephens  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to development in areas at risk of flooding (Policy P4).

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I object to the local plan as the development proposed is not sustainable (Policy S1)

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

5) In my view implemention of these proposals would ruin for ever the essential characteristics of the Horsleys by converting them into an urban dormitory for commuters to work elsewhere

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3) The magnitude of the proposed increase in the Horsleys housing would create unacceptable density in the area with irreversible environmental destruction and a major impact on thre local infrastructure.

4) Without major investment to expand our medical, educational, parking and drainage facilities these villages risk being overwhelmed by the influx of vehicles and people. Our local roads are already over used and dangerous in places.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16705  Respondent: 10877057 / Jennifer Dodd  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1) The exceptional Cir'cumstances required to take the Horsleys out of the Green Belt do not appear to have been proved. The Green Belt is the most valuable protection we all have to prevent uncontrolled urban sprawl and MUST not be given up lightly.

2) Whilst there is clearly unfullfilled Housing Need in the area which must be addressed it is not in itself a Special Circumstance needed to upset the Green Belt and the Housing needs requirement shown seems to be arbitrary and unproven.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3358  Respondent: 10877153 / Carol Ann Cullen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I do not agree with Strategic Housing Market Assessment. The mathematical model does not seem sound as it gives a population increase which is nearly 70% higher than the official national estimate for population growth in the Borough. The mathematical model used should be made public.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6533  
Respondent: 10877153 / Carol Ann Cullen  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the development of a 2000 house village at Ockham (Wisley Airfield)
The impact of such a large development so close to the Horsley villages would be catastrophic.
The local infrastructure is already overloaded. Local schools are full, medical facilities are at breaking point.
Drainage is a huge problem in the Horsleys as the drains are inadequate and further building will only lead to more flooding. This is particularly relevant to the site behind Ockham Road North.
Roads and car parks are overloaded. I am particularly concerned about parking at Horsley and Effingham Stations which is already at full capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13671  
Respondent: 10877153 / Carol Ann Cullen  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the classification of Station Parade as a District Centre. This area should not be targeted for future urban development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/13673  Respondent: 10877153 / Carol Ann Cullen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It appears that the increase in pollution has not been properly considered. The large increase in the volume of traffic will only increase pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13670  Respondent: 10877153 / Carol Ann Cullen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposal to remove the Horsleys from the Green Belt. I do not agree that the exceptional circumstances required before taking this action have been demonstrated. I am alarmed that 65% of new houses are to be built on land that is currently in the Green Belt. It is imperative that Green Belt Land is preserved.

I OBJECT to the extension of the boundaries of the settlement areas of the Horsleys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13672  Respondent: 10877153 / Carol Ann Cullen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I do not agree that the extensive developments at Burnt Common, Gosden Hill Farm and Burpham are necessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7843  Respondent: 10877217 / D E Cooper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to the removal of Effingham Village from the Green Belt.

We object to the removal of the surrounding villages of East Horsley, West Horsley, Ripley and Send from the Green Belt.

We firmly believe that the Green Belt needs to be protected. There may be parts of the Green Belt where it may be appropriate for the Parish Councils to consider developing, but this should be the exception rather than the general rule. Removing in toto all these villages from the Green Belt means a loss of habitat for wildlife, loss of wildlife corridors, and the loss of trees whose leaves absorb pollution. We already contend with major roads such as the A3, the M25 and an increasing amount of heavy and light vehicular traffic on our roads, so it is vital that our ‘green lungs’ are protected.

The Parish Councils are best placed to decide where small housing developments are appropriate and any total loss of Green Belt status could open the doors to wholesale, unwanted and unsustainable development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3241  Respondent: 10877249 / Ann Hamilton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The failure of GBC to provide sound evidence in terms of the Employment Land Needs Assessment 2015 (ELNA) which shows an 80% reduction in employment space from the previous ELNA carried out by GBC in 2013. This means that industrial space at Burnt Common is no longer needed. Housing numbers from the Strategic Housing Market Assessment 2015 (SHMA) are highly questionable. The number of foreign students has been wrongly used to inflate the need. The required 13,860 houses in the Local Plan is exaggerated. If the population is to grow by some 20,000 in the Plan period, 8,000 homes would be needed based on an average of 2.5 persons per home. The Green Belt does not need to be built over and half of new homes could be built on brownfield sites. It appears that GBC’s Transport Assessment was not even available to councillors for the vote taken on 24th May and this was only published on 6th June with infrastructure overload receiving scant attention.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3242  Respondent: 10877249 / Ann Hamilton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The removal of Send from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6376  Respondent: 10877249 / Ann Hamilton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The wholesale destruction of the Green Belt in this area (including the planned development of 2,000 homes at Gosden Hill Farm, Merrow – Policy A25) in clear contravention of the central government’s stated commitment to Green Belt protection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6374  Respondent: 10877249 / Ann Hamilton  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Garlick’s Arch (Policy A43) proposal to build 400 houses and 7,000 square metres of light / general industrial / storage distribution space on the Green Belt - there are no exceptional circumstances for this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6375  Respondent: 10877249 / Ann Hamilton  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The creation of new north and southbound slip roads to and from the A3 to the A247 Clandon Road (Policy A43A) at Burnt Common. Congestion already occurs on Send Road (A247) in the core hours of the day. Send would become the through route to Woking for traffic leaving the M25 and A3 as well as for vehicles coming from proposed housing developments in Wisley and Burpham (2,000 houses in each case).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6378  Respondent: 10877249 / Ann Hamilton  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The designation of land wet of Winds Ridge and Send Hill for 40 homes and 2 Travellers’ Pitches. This site is NEW and was NOT included in the regulation 18 draft and has NOT been consulted upon previously. This is a permanent Green Belt site within an area of beautiful countryside which would be spoiled by development. Also, the subsoil contains documented unsafe land fill waste which is currently vented. Bearing in mind the lack of public transport in the area it is safe to assume that the number of cars will greatly increase - the narrow width single track country lane providing access to the site makes it totally inadequate for settlements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13337  Respondent: 10877249 / Ann Hamilton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

None of these proposals are in the best interests of Send and its residents and any change to its Green Belt status would greatly diminish the character and identity of the village. In addition, the general strain on the infrastructure of the village in terms of roads, schooling and medical services would be overwhelming. Already in Send, traffic is heavy at certain times of day, schools over-subscribed and The Villages Medical Centre struggles to provide timely appointments for the residents currently registered.

I trust these objections are received and noted in accordance with procedure and look forward to news arising from the reassessment which will surely be necessary once the full extent of the resistance of local residents to the Local Plan proposals is known to GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13335  Respondent: 10877249 / Ann Hamilton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. The number of homes that the Plan intends to deliver and the geographical imbalance of the proposed developments
2. The enclosure of protected Green Belt within the proposed new village boundaries (for which there will be a presumption for development in the future).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1570</th>
<th>Respondent: 10877249 / Ann Hamilton</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): (No)</td>
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</table>

The failure of Guildford Borough Council (GBC) to follow due and correct process. Since 2014, GBC has changed the plans for every major site in Send proposed for development and now seeks to add a massive new road junction. The 2014 proposal for 430 houses reduced to 185 in April 2016 and now shoots up to 485. These significant changes require full consultation under Regulation 18, not the Regulation 10 short cut which GBC seek to get away with. This action appears to invalidate the whole process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/3696</th>
<th>Respondent: 10877313 / Millie Lipscombe</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

The existing infrastructure is already tremendously overloaded particularly where schools, medical facilities, roads and parking are concerned. With your proposals, there will be such a complete overload of the infrastructure. There is no room for appreciable increased traffic flow – how do you think anything is going to function with your proposals?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We are STILL having so many problems with drainage and sewerage despite the continued works at improving the situation in the area. How is the area going to cope with such a substantial increased number of houses?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. Provision for another full Village

The facilities in East Horsley village are getting very stretched and there is no room to expand. Provision must be made for a purpose built “village” area with its own shops including its own medical centre, Village Hall, Schools (nursery as well as primary), Creche/Day Care facilities youth centre, etc. There is now only Lloyds Bank in East Horsley - the only bank in the Village with an ATM.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3697  Respondent: 10877313 / Millie Lipscombe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Horsley Railway station car park is already operating on full during weekdays. With the increased number of houses in both East & West Horsley and in Ockham, most of these people will be using Horsley Railway station. Where are they all going to park?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3699  Respondent: 10877313 / Millie Lipscombe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- The small parade of shops near the Bell & Colville garage only has a tiny amount of parking spaces. This area is frequently very congested with lorries making deliveries and/or cars parked there. The road around here is VERY narrow and this causes much congestion for traffic to/from the A246. There is also no room for the road to be widened along this stretch. The roads will NOT be able to cope with substantially increased traffic.

- Parking at the shops in East Horsley for the shops and Public Library is already difficult currently. How is the village going to accommodate the extra people and cars from the proposed substantial increased housing?

Until you come up with a fully considered plan for the infrastructure to serve the proposed increased population, what you propose is just totally unsustainable and everything WILL come to a grinding halt and NOTHING will function. Will you take personal responsibility for this then?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3700  Respondent: 10877313 / Millie Lipscombe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **Roads Must BE Widened**

Lorries, buses and cars are now much wider than they used to be about 20 years ago. The roads were adequate then but they are NOT wide enough now!!! We are also sharing the roads with cyclists who are consistently now cycling 2 or 3 abreast. As there is full encouragement for people to cycle, then there must be proper provision for cycle/pedestrian pathways/lanes. On a recent occasion, there was a group of cyclists cycling three abreast and there were 15 of them cycling...
as a group altogether. It meant that it was impossible to overtake such a group of cyclists safely. Many motorists are now overtaking cyclists on a bend without being able to see if the road is actually clear! On one occasion, I was unfortunate enough to experience a Police car overtaking a single cyclist on a bend and if I had not braked in time, I would have been in an accident with a Police car!

1. Full Bus Services Must Be Put Into Place

Horsley railway station car park is nearly full up every day now. Where are the parking spaces for the increased number of people living in the additional housing in Wisley, Ockham, and East & West Horsley going to be located? On the other hand, if a bus service is to be provided, this must run frequently, say every 10/15 mins during very peak times and every 20 mins during very early mornings and late evenings for this to work.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3693  Respondent: 10877313 / Millie Lipscombe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I previously emailed you on 21 Sept 2014 with my objections to the draft Local Plan covering East & West Horsley and Ockham. As I understand that my previous objections will not be taken into account, I am therefore repeating my objections in this email below. In addition, to my previous objections, I wish to make Additional Points and these follow on after my Original Points.

Original Points

- The removal of East & West Horsley and Ockham from the green belt is just not tenable. You have not demonstrated the exceptional circumstances why this action is necessary.

You have not given good reasons for the proposed extension of the boundaries of the settlement areas of both East & West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3704  Respondent: 10877313 / Millie Lipscombe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **Ditches Must be Maintained**

Full and proper provision must be made to avoid flooding, including possibly for the County Council to take over private ditches when land rights are sold off. It only takes one landowner/householder not to maintain their ditch but it affects all other properties along the way.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/3695  **Respondent:** 10877313 / Millie Lipscombe  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Why have you not made more of development of existing brownfield sites instead of developing greenbelt sites?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/3705  **Respondent:** 10877313 / Millie Lipscombe  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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5. **Roads Must Be Maintained**

The roads in Ockham, East & West Horsley are very poorly maintained with pot holes everywhere. Until something as basic as this can be sorted out, how can we trust that the roads will be maintained with the increased traffic from all the extra proposed housing.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** SQLP16/711  **Respondent:** 10877313 / Millie Lipscombe  **Agent:**
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The housing requirements for the area are not based on correct data.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/712  Respondent: 10877313 / Millie Lipscombe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

ADDITIONAL Points

We now have Brexit! We do not need to have a continued frenetic pace for provision of housing.

There needs to be a properly fully considered plan which includes full provision for the necessary infrastructure to be in place at the same time, if not before additional housing is approved. It is not only untenable what is currently proposed, it is also highly irresponsible! It is akin to Tony Blair taking us into a war with Iraq before putting plans into place for what happens AFTER the war. Can we sue Guildford Borough Council or all the individual councillors then? The issues that I can immediately think of, but not limited to, are as follows:

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3925  Respondent: 10877409 / Peter Lipscombe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
• We are currently experiencing problems with flooding roads, much drainage problems and sewage overflow arising as a result. With the proposed increased building, this will exacerbate the flooding, drainage and sewage problems even more.

• The schools, medical facilities, shops and parking are already operating at full capacity. How do you propose the place will function with your proposed addition of over 600 houses in the next five years? It is just simply not sustainable.

• Horsley railway station car park is full most of the time on weekdays – where are commuters going to park? In this connection, you need to take into account the proposed increased number of people living in Ockham and the Horsleys as well. It is no point increasing the housing in the area if people cannot get to work in an efficient manner.

• The roads in the area have considerable difficulty accommodating the Repton local bus service because the roads are narrow and there is no room to widen the roads either. Traffic constantly comes to a halt to allow the Repton bus to get through. This is particularly bad when the school rush hour is also on at the same time.

• East Horsley Medical Centre is already operating at full capacity. We have to wait days and sometimes even a fortnight to get an appointment to see a doctor. The car park for the surgery is frequently operating at full capacity during full surgery hours.

There is inadequate state primary and secondary school places to accommodate children resulting in many children having to travel distances. This adds significantly to the traffic problems in the area during the school rush hour.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3923  Respondent: 10877409 / Peter Lipscombe  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The transport arrangements in the area are completely inadequate and will not be sustainable with the proposed new development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3924  Respondent: 10877409 / Peter Lipscombe  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

East & West Horsley are small villages. Where is the space for the roads to take the increased traffic?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3919  Respondent: 10877409 / Peter Lipscombe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

On 21 September 2014, I previously emailed you with my objections to a draft Local Plan covering Ockham, East & West Horsley. I understand that my previous objections will not be taken into account in the current consultation. I am therefore repeating my objections in this email below.

I strongly object to the proposed plans on the following basis:-

You have not demonstrated a proper case for the removal of the Green Belt boundaries from West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3928  Respondent: 10877409 / Peter Lipscombe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Why is there not more development made of brownfield sites instead of developing greenbelt sites? In addition, now that we have had a referendum and Brexit is to happen, we should not be destroying the countryside when there is no longer the same unproven anticipated housing requirements and at such a frenetic pace at that.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/733  Respondent: 10877409 / Peter Lipscombe  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

You have not proven the need for such a drastic increase in housing requirements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/734  Respondent: 10877409 / Peter Lipscombe  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The housing requirements for the area are not based on correct data.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3973  Respondent: 10877441 / M.K. Llanwarne  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A46
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford Local Plan: Normandy/Flexford Strategic Site-Policy A46

I have lived in Normandy for 45 years and I strongly object to the proposed development on the above Green Field site. I fully accept that more houses are needed throughout the borough but I am horrified at the massive development proposed for this site which will completely destroy our rural environment.

We are advised that a 7FE secondary school is needed in the west of the Borough and that the provision of such a school would constitute "exceptional circumstances" that are required to remove the land from the Green Belt. This site is Grade 3 arable and pastoral land with important flora and fauna and is only 1 km away from the Thames Basin Heaths and a large development could have a detrimental effect on the TBHSPA. The site was stated by Councillor Spooner at our Parish Council Meeting in February to have "red Sensitivity".

School

Is the school actually needed? I know that Keith Witham our Surrey County Councillor has carried out detailed research and I understand that Surrey Education Department have unfilled secondary places in the west of the borough in the medium term to cater for over 700 children and other schools are willing to expand. The Council has no doubt been provided with all the details of Keith Witham's research. If these figures are correct why should children have to travel to Normandy by train, bus or car when they have schools near to them?

In my opinion the school is not required and following Councillor Bilbe's amendment to the draft Local Plan at the Planning Meeting on 24th May the strategic site in Normandy should be excluded in its entirety. This view is strongly felt by many residents as you are no doubt aware. However if our views are ignored will you also consider the following points:

Roads/Traffic Chaos

This development would link up to roads classified as C16 (Westwood Lane and Wanborough Hill) and D60 (Glaziers Lane-unclassified road). I live opposite a small nursery school with cars parked outside in Glaziers Lane when the children are dropped off and collected by their parents and this will be increasingly dangerous initially with contractors' vehicles going up and down to the site. Because of my age I no longer drive but I am aware from my carers who have to come each day and neighbours that the local roads grind to a halt at peak times and increased traffic from the houses proposed and a huge secondary school with daily drop off and pick-ups would make the situation untenable. Westwood Lane with a low railway bridge and one way traffic would not be viable for big lorries etc during the building stages which would force heavy traffic from A31 and A323 onto Glaziers Lane which has a narrow railway bridge over the railway line and in addition large vehicles coming off A323 have to come across both lanes as they turn into Glaziers Lane which creates a dangerous situation for vehicles going onto or crossing the A323. I recall too that in recent years Glaziers lane has had problems with subsidence on the corner coming off the A323. Would it not be at enormous risk with the heavy increase of traffic especially contractors vehicles etc?

Flood Risk/Sewage

Normandy/Flexford has a very high water table with rain water draining down from the Hogs Back and from the Ash Ranges and flooding in wet periods is a frequent occurrence throughout the village so with a vastly increased population the sewer system and drainage are a major concern. You will see that I live at 116 Glaziers Lane, backing onto the proposed site and my neighbours and I suffer from significant amounts of laying water particularly in wintertime. From my own experience I lost a large tree last winter as its roots were completely waterlogged. With the extensive building proposed the problems will undoubtedly increase with a risk of subsidence.
Conclusion

If the development, as proposed, went ahead it would double the size of the village and would further increase the risk of flooding. There is no way the existing infrastructure could support if with regard to roads(without 2 new railway bridges and traffic lights to get onto or across the A323), drainage, sewage, worries with an overhead electricity supply and the very high water table. All vast problems.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

• Destroy views from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
• Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
• Increase tailbacks on the A31 and traffic congestion
• Result in rat-running through local roads
• Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/144  Respondent: 10877601 / Geoffrey Cole  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/84  Respondent: 10877633 / Thelma Cole  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4157  Respondent: 10877665 / Audrey Ivatts Audrey Ivatts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of provision for new schools and health care facilities in the Send and Ripley area.

I object to the lack of infrastructure improvements to help deal with the large increase in road vehicles caused by having so many more people living and working in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2827  Respondent: 10877665 / Audrey Ivatts Audrey Ivatts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1) I object to the proposed developments at Clockbarn Nursery, Garlick’s Arch and Send Hill for a number of reasons:
2) The substantial loss of Green Belt land which will result if these developments take place
2) The large increase in road congestion, noise and pollution
3) The loss of the semi-rural nature of Send and Ripley
4) The lack of adequate provision for schools and health care facilities
5) The lack of infrastructure improvements to help deal with the large increase in road vehicles caused by having so many more people living and working in the area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4155  Respondent: 10877665 / Audrey Ivatts Audrey Ivatts  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Send Village being removed from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4158  Respondent: 10877665 / Audrey Ivatts Audrey Ivatts  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

With specific reference to the above points, I object to the proposed development at Clockbarn Nursery, Garlick's Arch, and Send Hill.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the large amount of proposed development which will permanently alter the semi rural nature of the Send and Ripley area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17081  Respondent: 10877665 / Audrey Ivatts Audrey Ivatts  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that these proposed developments will cause a substantial increase in traffic, noise, congestion and pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17076  Respondent: 10877665 / Audrey Ivatts Audrey Ivatts  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the loss of Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2044  Respondent: 10877697 / Derek Howorth  Agent:
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<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT to the proposed development at Wisley airfield. The addition of 2,000 houses only two miles away would put an impossible strain on local amenities and roads.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT to the number of The Horsleys Development sites. This would result in additional 593 homes which is, in my view, far to many and would totally change the village character.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>The local infrastructure is already seriously overloaded with schools full, medical facilities seriously stretched and inadequate parking.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT to the removal of the Horsleys from the green belt. I have no objection to sustainable development PROVIDING the character of any new development does not clash with surrounding properties or increase the density of existing property.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I OBJECT to the extension of the boundaries of the settlement areas. This appears to be proposed solely to increase the amount of land designated for development.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<th>Comment ID: PSLPA16/843</th>
<th>Respondent: 10877857 / Tanya Morgan</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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As a resident of Horsley for many years, I am now extremely worried about your plans to nearly double the size of our village. My worries are as follows:

1. The proposal to remove the Horsleys from the Green Belt is a disaster. The Green Belt was designed to benefit not only the villages surrounding it but also the city of Once this land has been built on we can never go back, no matter what the consequences of this foolish decision. Only in the very exceptional circumstances when all other solutions have been exhausted should we even contemplate diminishing the Green Belt.

2. The local infrastructure as it stands can barely deal with current demands from the existing population. Our schools are full and many parents are having to send their children out of the village to be educated which also increases the already heavy traffic on our narrow roads. With regard to our roads, they are narrow, in poor condition and in many places do not have the luxury of pavements alongside them. With further increased traffic pressure this is going to make it even more dangerous for any parents and children who choose to walk to and from school rather than sit in the queues of traffic. With extra houses come extra cars that need to park as well as travel on the roads. In Horsley parking is extremely limited especially for the commuters who use the railway station. Even if most of the new residents wish to travel by train, how are we going to extend the car parking facilities? More residents will only increase the need for extra parking for people to attend the village hall, the doctors surgery and the local shops (the few that we have). Road side parking is not an option and the local car park is very small.

3. The local development at Wisley airfield if it goes ahead will certainly impact on our village as the residents from this development will surely wish to use Horsley Station which again doubles or even trebles the traffic problems in Horsley.

4. I doubt that we really need such a large increase in the number of houses in this We certainly don't need more 4 and 5 bedroom houses for current needs but you are trying to lure the people from London here to line the developer's pockets. If any houses need to be built, we need serious numbers of 1, 2 and 3 bedroom properties, some of high end spec to attract a number of elderly residents who currently are living in very large houses and would like to downsize to more compact but never the less extremely nice houses. We also need small houses for the younger people to enable them to live in the area in which they have been brought up in a property that they can afford.

5. In Horsley we have one medical centre to cope with all the needs of the residents of the village How are they going to cope with a large increase of patient numbers? Also all the extra developments in surrounding villages are going to mean that our local hospital The Royal Surrey is going to face huge problems in the not too distant future.

6. Surely you should be looking at developing any Brownfield sites within the Guildford area before invading the Green Belt!!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7573  Respondent: 10877921 / Susan Prentice  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I write to object to the aspect of the Local Plan relating to Wisley Airfield.

1. This development will lead to the urbanisation of Green Belt land, a precedent that will lead to urban sprawl towards Guildford.

1. Any developments in this area will increase traffic flow in an area that is already often congested with M25 and A3 junction. This congestion spills into local towns such as Cobham compromising the amenity for local residents.

1. Local public resources are saturated. GP's surgeries, schools, police and transport are currently inadequate. Further population would require new resources.

1. Local towns would be overwhelmed with limited access roads, limited parking and would be less accessible for current residents.

1. To support any developments in the area of Wisley, Ripley and Send would require new shops and public amenities. This investment would need further development to justify costs, which would create out of town shopping areas. In turn this could reduce footfall in local towns.

1. Air pollution in this area is often poor being at the junction of M25 and A3. This section of the M25 is the busiest road in Europe.

1. Wildlife is profuse in these areas and any developments would impact them greatly.

1. With no public transport close to this area residents would be reliant on cars or buses. The roads in this area are unsuitable for larger vehicles or increases in volume.

1. Application 15/P/00012 was unanimously rejected by Planning Officers due to concerns such as the ones I have mentioned.

It is important that local views and expertise is respected and that the democratic process is respected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 10877953 / Stephen Day</th>
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<td>The density of proposed additional housing in East and West Horsley. To add 593 houses to already overcrowded schools, medical facilities and the railway will have a major negative impact on the daily life of local residents.</td>
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<td>The proposal to remove the Horsleys is outrageous. No “exceptional circumstances” have been demonstrated. The Council has a duty to protect the Green Belt for future generations.</td>
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<td>No sound reasons have been given for the proposed extension of the settlement areas of the Horsleys.</td>
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I wish to register my strong objection to the local plan, which will have a severely detrimental impact on our
neighbourhood. I object in particular to -

1. The density of proposed additional housing in East and West Horsley. To add 593 houses to already overcrowded
schools, medical facilities and the railway will have a major negative impact on the daily life of local residents.

2. The proposal to remove the Horsleys is outrageous. No "exceptional circumstances" have been demonstrated. The
Council has a duty to protect the Green Belt for future generations.

3. No sound reasons have been given for the proposed extension of the settlement areas of the Horsleys.

4. The development of the Wisley airfield site in Ockham would have an absolutely massive impact on the area, entirely
changing the environment for existing residents and blighting daily life for all concerned. Public facilities are already
overloaded. The heaviest impact would fall on the most vulnerable, especially the elderly.

The local plan would, in short, destroy the village community and turn the area into yet another bleak commuting
dormitory.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3919   Respondent: 10878081 / Linda June Turner   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. New north and south bound slip-roads to and from the A3 to the A 247 Clandon Road

Where the traffic is already causing problems and any problem on the A3 and the Guildford area creates total gridlock. This
scheme would encourage more traffic to use the Send and Clandon roads to access the A3 and these roads are already at
their full capacity.

There is no scope for widening roads in this area. The proposed housing would add another 1,000 cars and other is heavy
traffic. This junction will not case the traffic problem in and around Guildford but drastically add to it. G.B.C. have inserted
this late scheme to aid development at Gosden Hill Farm and the former Wisley airport. This will be the beginning of major
urban sprawl development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3920   Respondent: 10878081 / Linda June Turner   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

---
1. Send Hill proposal for 40 homes and 2 traveller sites

Send Hill IS II very narrow road and would not support movements of caravans. This land has also been used for landfill previously and is therefore unsuitable for development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8366  Respondent: 10878081 / Linda June Turner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The number of houses that the Plan intends to deliver over the 20 year period

This has increased from 652 to 693 and should have taken into account the constraints which should have been put in place by the high proportion of the borough's designated Green Belt and the overall infrastructure of roads, schools, hospitals, doctors, etc.

   1. The new boundaries proposed for insetting the villages of Send and Send Marsh/Burnt Common from the Green Belt.

The boundaries should be more closely drawn to the villages to prevent urban sprawl and to prevent the losing their identities. The land within these proposed boundaries would encourage further over-development and expansion of the villages. Rural identities would be lost forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/115  Respondent: 10878273 / Charlene Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I am writing to say that the following points as I am concerned that the local plan will destroy our villages. As a resident in Ripley I am very concerned about the extra traffic that will use the already very congested roads, the lack of schools for our children as we already lack that and the fact that our village will no longer feel like a nice small community which is the reason we moved here.

I object to the lack of evidence for the alleged housing need numbers.

I object to the lack of provision for new schools.

I object to the lack of provision for doctors surgeries.

I do strongly support The Ripley Action group and hope we succeed in our cause to ensure our villages and green belts are protected from over building and development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Respondent: 10878273 / Charlene Taylor</th>
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I object to all erosion of the green belt.

I object to any removal of villages from the green belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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I object to the disproportionate amount of development of one area in the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/112  Respondent: 10878273 / Charlene Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the limited consultation period.
I object to the last minute inclusion of new sites with less than 2 weeks notice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1608  Respondent: 10878433 / John Townsend  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1275  Respondent: 10878433 / John Townsend  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the building on the Green Belt at Send at Garlick's Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2309  Respondent: 10878433 / John Townsend  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the exaggerated "housing need" figure of 13,860 which is far too high and results & in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford's urban brownfield areas much closer to existing transport hubs.

I object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the (A247) would be gridlocked all day.

I object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25.

I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.

I object to the development at Garlick's Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks' notice and without any prior consultation and is not required in terms of housing need either for the village or the borough.

I object to the development at Garlick's Arch because the site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The site is also subject to flooding.

I object to building 45 houses at Clockbarn because of inadequate access and traffic volume.
Tannery Lane is far too narrow and bendy to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.

I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3085  Respondent: 10878433 / John Townsend  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3084  Respondent: 10878433 / John Townsend  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to the development at Garlick’s Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks’ notice and without any prior consultation and is not required in terms of housing need either for the village or the borough.

I object to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available.
I object to the development at Garlick’s Arch because the site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The site is also subject to flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the (A247) would be gridlocked all day.

I object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6677  Respondent: 10878433 / John Townsend  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the large proposed development of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6684  Respondent: 10878433 / John Townsend  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<tr>
<td>I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford.</td>
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<td>I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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</table>
I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.

I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan. Young people want to live in towns close to work and transport - build in Guildford!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6682  Respondent: 10878433 / John Townsend  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6685  Respondent: 10878433 / John Townsend  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

Young people want to live in towns close to work and transport – build in Guildford!

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** SQLP16/1026  **Respondent:** 10878433 / John Townsend  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/1079  **Respondent:** 10878465 / George Kalorkoti  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I am writing in relation to the Proposed Submission Local Plan that Guildford Borough Council (GBC) has now published for public consultation:

1. I OBJECT to what is excess growth in housing stock compared with anticipated population in The plan shows housing stock growth of 25% compared with projected population increase of 15%. In addition, I question whether the anticipated population increase is overstated in view of Brexit.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/1081  **Respondent:** 10878465 / George Kalorkoti  **Agent:**
At its Annual General Meeting on 21 June 2016 Manor Close East Horsley Residents Association (MCRA) gave careful consideration to the Proposed Submission Local Plan that Guildford Borough Council (GBC) has now published for public consultation, including in particular the proposal to remove Fangate Manor from the Green Belt and include it within the Settlement Boundary. Individual residents will, if they feel it appropriate, submit their comments to GBC on the draft local plan. I am writing on behalf of MCRA to address specifically the proposals relating to Green Belt and to Fangate Manor:

1. **We OBJECT** to the proposal to inset East Horsley from the Green Belt. The proposal to inset East Horsley from the Green Belt will be detrimental to the rural character of the village and should be dropped. The specific changes proposed are not justified under the National Planning Policy Framework rules.

2. We strongly oppose and **OBJECT** to the proposal to remove Fangate Manor from the Green Belt and include it within the Settlement Boundary. There are no exceptional Planning circumstances to justify removing Fangate Manor from the Green Belt, and changing the Settlement Boundary does not in any way enhance the defensible nature of the Settlement Boundary. It merely involves moving the boundary from one hedgerow to another, but leads to the loss of Green Belt and agricultural land.

3. There is an **ERROR** in the Land Availability Assessment dated February 2016, and we ask that GBC corrects this. There is a plan on page 299 that appears to show access to Fangate Manor from Manor Close. Manor Close is a private road, and access will not be granted. MCRA will oppose any change to the character of this very quiet road. The road and the verges are narrow and are not suited to any growth in traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>9. I <strong>OBJECT</strong> to the proposed Wisley Airfield development. This would result in the creation of a new town and the destruction of the character of one of most picturesque and historic areas of the country. Furthermore, the proposed development would increase significantly the load on already inadequate local infrastructure, including that in East Horsley, and would overstretch the Horsley and Effingham Junction railway stations.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>6. I <strong>OBJECT</strong> to the affordable housing policy because it assumes one size fits all and is applied uniformly across the borough. I am asking that it should be revised so that it is targeted where the need and demand exist.</td>
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8. **OBJECT** to the additional strain that would be placed on local infrastructure as a result of the proposals in the plan and to the lack of any proposals in the draft plan to address current shortcomings let alone the excess load that would result if the draft plan is adopted as propos Local infrastructure is already overstretched, and examples include:

- The roads through East Horsley are narrow and cannot cope with large vehicles that travel over them.
- Car parking is limited and insufficient.
- Pavements are in poor condition and narrow.
- There is poor drainage that results in surface water flooding.
- School places are not always sufficient to meet current need. This is true for both primary and secondary school places. For example, the Raleigh School is at capacity, and the proposal for an additional 593 houses would require some 150 further primary school places for which there is no proposal in the draft plan.
- The Medical Centre is already at capacity, and the draft plan’s proposal is not to expand it until years 5-15 of the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
7. I **OBJECT** to the proposal to move the East Horsley settlement boundary westwards to the eastern boundary of Lollesworth Wood and to the proposal to take all of Kingston Meadows out of the Green Belt as a result of another proposed change to the settlement boundary. These and other changes that I have highlighted earlier are not justified under National Planning Policy Framework rules.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPA16/3223</th>
<th><strong>Respondent:</strong> 10878529 / Phil Beddoes</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
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<td>I also <strong>OBJECT</strong> to the two other sites in Send ...... both of which are accessed via very very narrow country lanes without footpaths in part, which are presently heavily used and parent a significant hazard to users on foot.</td>
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<td>I wish to comment on the above document.</td>
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<td>I have been a resident of Send for 13 years and very much enjoy the rural feel of the village. That said I also understand the real need to provide homes and particularly homes that can be afforded. I am therefore not against development where it is required and appropriate to the community in which it is set.</td>
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<td>In general I do not believe that the LP you propose has housing provision which is either required or appropriate.</td>
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I OBJECT to the housing need assessment. The over provision of housing in the LP by 30% is outside government policy and places significant pressure on the borough. In addition the inability to recognise the constraints of the large area of green belt in the borough has lost an opportunity to reduce the housing need for real and legitimate reasons. Consequently wholly unsuitable sites have been identified including Garlick's Arch in Send.

The lack of any opportunity to scrutinise the assumptions of the housing need assessment was also unfortunate and poor government.

At the May meeting of your Cabinet authority was given to the Lead Officer to add minor changes to the LP before it hit your Council meeting. Consequently Garlick's Arch and the commercial site plus the new junction was added. This was not a minor change and I would suggest your council acted wrongly in considering the matter at Council.

I OBJECT to Garlick's Arch development. The huge increase in houses in our village will have a devastating affect on our roads and community facilities. With respect to roads your plan does not provide any information on the traffic implications in the area. Our roads are overflowing at certain times of the day, we have very few buses and no sustainable routes for cycling and more are they propose in your plan.

Garlick's has been badly thought through with developers interests being placed in advance of your residents shame on you all!!

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
A 43a The proposed Northbound and Southbound slip roads

I strongly object to the proposed northbound and southbound slip roads on the A3 as our roads are already congested for much of the day. The amount of lorries and other commercial traffic that already thunders through our village on the A247 is bad enough now. There are problems with speeding, pollution and no safe crossing points The proposed sliproads would increase this tenfold. The road is bordered on both sides by housing, businesses, side roads, a recreation ground and the primary school. Why are the children and adults of Send less important than in other parts of the Guildford area?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7011  Respondent: 10878561 / Amy Dowsett  Agent:

A 44 Land west of Winds Ridge and Send Hill

As a resident of Send Hill I strongly object to any further development on the hill. The road is not wide and in some places only one car can pass at a time, this is also the case along the wider areas if there are parked vehicles on the road (Send Hill being a residential road).

There are no pavements and pedestrians have to walk along the road. Many villagers use Send Hill in order to visit St Mary's Church and the cemetery which has recently been extended, as well as dog walkers and cyclists, ramblers and, of course, residents.

The land is filled with mature native trees, wildflowers and attendant wildlife. Part of it is an old tip which has methane gas meters across it. It is directly behind existing housing and faces Send Hill, a former quarry which was landscaped when it closed down.

There is a huge amount of wildlife on this area including rare species. Before the land was "landscaped" you could find sand lizards and there were hundreds of Sand Martin nests in the sand wall below the original footpath. These were completely destroyed by bulldozers.

There are still grass snakes, slow worms, and a neighbour has seen adders. More importantly, I have seen two smooth snakes in this vicinity.

There are bats, owls, woodpeckers, red kites, buzzards, sparrowhawks, kestrels, stonechats, redwings, cuckoos, and numerous other bird species.
Badgers, foxes, deer, rabbits, hares, stoats and other mammals reside, feed or traverse the hill. Building on this site will destroy yet more of our natural world.

The road is narrow by the proposed site and access for extra vehicles, lorries, caravans etc., would be difficult to say the least. The extra traffic would put pedestrians and cyclists at severe risk.

Send Hill has a restriction on having caravans, mobile homes and any structures placed upon it.

The location of Send Cemetery on the hill is a peaceful and beautiful site with spectacular sunset views, fields and trees. It is a tranquil place for thought and remembrance and should not be ruined by housing, noise, traffic and traveller sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I wish to object to the various plans put forward in the Local Plan relating to the village of Send.

Send is a village within the green belt and I strongly object to it's removal, whether in it's entirety or in pieces, from the green belt. There are enough brown field sites within the Borough that could and should be used for building without having to steal our precious green belt and destroy our village forever.

I strongly object to the building of a vast amount of houses and industrial units in Send as it will increase the population by at least 25% without there being the infrastructure to support this type of increase. During the past 25 years, there has been a lot of housing built within the village and the local amenities are already stretched. Our roads are at a standstill during rush-hours, and combined with roadside parking and the narrow width of many of the roads, the extra traffic created by the local plan will make living in our village unbearable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I strongly object to the proposed northbound and southbound slip roads on the A3 as our roads are already congested for much of the day. The amount of lorries and other commercial traffic that already thunders through our village on the A247 is bad enough now. There are problems with speeding, pollution and no safe crossing points. The proposed slip roads would increase this tenfold. The road is bordered on both sides by housing, businesses, side roads, a recreation ground and the primary school. Why are the children and adults of Send less important than in other parts of the Guildford area?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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There are no pavements and pedestrians have to walk along the road. Many villagers use Send Hill in order to visit St Mary's Church and the cemetery which has recently been extended, as well as dog walkers and cyclists, ramblers and, of course, residents.

The land is filled with mature native trees, wildflowers and attendant wildlife. Part of it is an old tip which has methane gas meters across it. It is directly behind existing housing and faces Send Hill, a former quarry which was landscaped when it closed down.

There is a huge amount of wildlife on this area including rare species. Before the land was "landscaped" you could find sand lizards and there were hundreds of Sand Martin nests in the sand wall below the original footpath. These were completely destroyed by bulldozers.

There are still grass snakes, slow worms, and a neighbour has seen adders. More importantly, I have seen two smooth snakes in this vicinity.

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Badgers, foxes, deer, rabbits, hares, stoats and other mammals reside, feed or traverse the hill. Building on this site will destroy yet more of our natural world.

The road is narrow by the proposed site and access for extra vehicles, lorries, caravans etc., would be difficult to say the least. The extra traffic would put pedestrians and cyclists at severe risk.

Send Hill has a restriction on having caravans, mobile homes and any structures placed upon it.

The location of Send Cemetery on the hill is a peaceful and beautiful site with spectacular sunset views, fields and trees. It is a tranquil place for thought and remembrance and should not be ruined by housing, noise, traffic and traveller sites.
Thank you for the opportunity to comment on the Local Plan.

I am very disappointed that the points that I raised on the July 2014 draft plan have not been addressed.

Whilst I understand the need for more houses the scale of increase is totally out of proportion to the size of West Horsley village. West Horsley has around 1,100 houses - the plan to increase this by 35%, and within the 5 year plan will destroy the village and change it into another urban sprawl.

More houses are needed in the urban areas where people work not in the country which results in additional commuting which will only worsen the pressure on all the infrastructure services and particularly the roads. The plan does not address these issues and it is crucial that it does.

My main concern is with regard to the roads and parking. At peak times they are currently inadequate and will become totally congested with the likelihood of a further 800+ cars in the village associated with the planned new housing. Car parking is already very difficult and there is very little scope for further parking or road improvements. The station car park is also inadequate and often at capacity. The paths are already narrow and very dangerous in places, particularly along the main Ockham road and East Lane.

Some additional housing is needed but this is not more of the large four/five bedroomed houses that have been built over the past few years. There needs to be more smaller housing for first-time buyers and for those 'downsizing' such as the housing of Weston Lea, and this needs to be with easy access to the local shops and services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

Proposed Submission Local Plan

I have reviewed the Proposed Submission Local Plan published by Guildford Borough Council (GBC) for public consultation- and am dismayed by some important aspects of its content.

In particular:

1. I do not agree with the scale of the proposed house building programme. The target shown represents a 25% increase in the Borough housing stock. However, the Office of National Statistics projects merely a 15% population increase for Guildford Borough over the same period.

Therefore I object to the Borough housing targets set out.

1. The Local Plan incorporates the statement "We will continue to protect the Metropolitan Green Belt". However, GBC would seem to be in breach of this aim through the housing policies it has set out in the Local Plan, in which 65% of the developments will be made on land that is currently Green This includes the proposal to inset East Horsley from the Green Belt; propose boundary changes and the proposal to remove Wisley Airfield from the Green Belt.

Consequently, I object to the proposed intrusions into the Green Belt, which will have a material adverse impact on the area.

1. The infrastructure proposals appear inadequate to meet existing and current needs, let alone those of the area after the additional proposed developments in the local Pl

Therefore, I object to the proposed infrastructure proposals.

5. Consequently, in summary, I object to the Proposed Submission Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
+ The Plan continues to propose " insetting " East Horsley " from the Green Belt.

+ Changes in settlement boundaries mean the East Horsley settlement area will increase by 37% and include most roads south of the A246.

+ Development of 100 homes is still proposed near Horsley station.

+ Development of some 2000 homes is still proposed on the former Wesley airfield.

+ Around 57% of all new housing in the Local Plan is on land which is currently Green Belt.

+ while the ONS forecasts population growth for Guildford at 10.4% over the period of the Plan, GBC proposes to increase housing stock by 22%.

+ Consequently, I strongly object to the excessively high housing targets being set, the failure to recognise the various constraints to this development and the large-scale destruction of the Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/2648</th>
<th>Respondent: 10878977 / Lisbet Hjort Jensen</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>1. I OBJECT to the proposed Infrastructure Schedule (Appendix C)</td>
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<td>The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Comment ID: PSLPA16/2649</td>
<td>Respondent: 10878977 / Lisbet Hjort Jensen</td>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

0 The "objectively assessed need" figure of 693 homes a year is too high. A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

0 The current SHMA inflates the proposed housing figure due to failure to correct for errors in the historical data for international migration flows, issues with the way it considers students and affordability and flaws in the method for estimating the number of homes needed to support job growth. It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5553   Respondent: 10878977 / Lisbet Hjort Jensen   Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.
Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 where the traffic is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham's sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England's requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an "aspiration" in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like East and West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/ further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5554  Respondent: 10878977 / Lisbet Hjort Jensen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the inclusion of the land at Garlick's Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (BB).

There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick's Arch site.

There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced by a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council's own Green Belt & Countryside Report does not address Garlick's Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy 03).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site (Policy I4).

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5555  Respondent: 10878977 / Lisbet Hjort Jensen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11013  Respondent: 10878977 / Lisbet Hjort Jensen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11005  Respondent: 10878977 / Lisbet Hjort Jensen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick's Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (BS) at Garlick's Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick's Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/11008  Respondent: 10878977 / Lisbet Hjort Jensen  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floor space at Garlick's Arch - Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and BS) floor space will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floor space to be located at Garlick's Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/11011  Respondent: 10878977 / Lisbet Hjort Jensen  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the loss of rural employment (Policy E5)

Policy ES supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick's Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11035  Respondent: 10878977 / Lisbet Hjort Jensen  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY EG6- The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor "attractions" and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/"Disneyfication". Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many "leisure and visitor attractions" already. The case for creating more is not made and no examples are given. Instead, the plan's explicit priorities should be:

1. To protect the borough's prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford's river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An "English town break" (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently bypass Guildford to go to Bath, Oxford or Cambridge instead.
4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11019  Respondent: 10878977 / Lisbet Hjort Jensen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. I OBJECT (POLICY H1- Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan peri. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinized or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11034  Respondent: 10878977 / Lisbet Hjort Jensen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3 - Rural Exception Homes

I OBJECT. This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the "mix" this can include "market" housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11015  Respondent: 10878977 / Lisbet Hjort Jensen  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.
The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11016  Respondent: 10878977 / Lisbet Hjort Jensen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick's Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents' in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick's Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11017  Respondent: 10878977 / Lisbet Hjort Jensen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2
I OBJECT due to the congestion that development will cause to the trunk roads, A 3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11018  Respondent: 10878977 / Lisbet Hjort Jensen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that "Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health." The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11000  Respondent: 10878977 / Lisbet Hjort Jensen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a 'special circumstance' and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick's Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding.
Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<table>
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<tr>
<th>Comment ID: PSLPP16/10990</th>
<th>Respondent: 10878977 / Lisbet Hjort Jensen</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on the existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on the existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly consi It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoore, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (dandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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<tr>
<td>1.</td>
<td>I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.</td>
</tr>
<tr>
<td>2.</td>
<td>There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.</td>
</tr>
<tr>
<td>3.</td>
<td>Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,</td>
</tr>
<tr>
<td>4.</td>
<td>The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity</td>
</tr>
<tr>
<td>5.</td>
<td>The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.</td>
</tr>
<tr>
<td>6.</td>
<td>The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.</td>
</tr>
<tr>
<td>7.</td>
<td>I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).</td>
</tr>
<tr>
<td>8.</td>
<td>The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.</td>
</tr>
<tr>
<td>9.</td>
<td>A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.</td>
</tr>
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</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/4427  **Respondent:** 10878977 / Lisbet Hjort Jensen  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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<tbody>
<tr>
<td>1.</td>
<td>I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches</td>
</tr>
<tr>
<td>2.</td>
<td>It ignores all the thousands of previous objections made by local people</td>
</tr>
<tr>
<td>3.</td>
<td>There is no proven demand for travelling show people plots in this location</td>
</tr>
<tr>
<td>4.</td>
<td>There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.</td>
</tr>
</tbody>
</table>
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.

6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the Green Belt be intent on conserving it rather than exploiting it.

7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.
18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2854  Respondent: 10878977 / Lisbet Hjort Jensen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/542  Respondent: 10878977 / Lisbet Hjort Jensen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5752  Respondent: 10879073 / Natalie Caviet  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
I object for the following reasons:

1. **We should not allow building on green belt land.** We should protect this land because:
   1. It provides the area with valued natural beauty and rural character
   2. It provides a needed break up to urban sprawl – important given the high areas of pollution in the area
   3. It provides natural habitats for local wildlife that should be valued and taken care of

1. **The plan will magnify and worsen current shortfalls in existing infrastructure.** The allocation of housing to Ockham, Ripley, Horsley and Effingham and the 2,000 new homes at the former Wisley Airfield is hugely disproportionate and will adversely impact of the communities of the borough of Elmbridge. For example, the large number of new inhabitants of the proposed new housing will:
   1. Take traffic congestion beyond breaking point. Elmbridge roads, particularly at key intersections such as the Painshill junction, are already very overcrowded, particularly at rush hour. It is unthinkable to make this problem worse however a deterioration of the situation is inevitable since residents of the new planned housing will produce an estimated 4,000+ cars and will have to pass through these areas to commute or to shop/socialise.
   2. Take parking problems beyond breaking point. This is because residents of the proposed new development will be relying on existing car parking provisions at Elmbridge shops and rail link services. The car parks at the two nearest stations are already at capacity at peak times, and there is no overflow area to cater for the huge numbers of potential additional residents. It is also true that a simple trip to the local shops (which the 2,000 residents of the Wisley airfield would be looking to use) can already involve long queues to park e.g. at Waitrose, since at peak times spaces simply run out. 4,000+ cars-worth of new local shoppers will make this intolerably worse.
   3. Taking public transport problems beyond breaking point. Local train services are already hugely overcrowded. I commute daily from Cobham and can confirm that in spite of recent improvements, rush hour services are still commonly full/standing-room only. The idea of a large volume of new commuters joining these services is crazy. There is genuinely no space. The planning department is either naïve or willfully negligent to recommend that residents at Wisley could drive to Cobham station– this will be terrible for roads, parking and the train itself, all of which are at capacity already!
   4. Take local services beyond breaking point. We do not have adequate local services, e.g. doctors surgeries, to cater for the large increase in population density. It is already impossible to get an appointment on the day unless you queue outside the surgery for 30 minutes before it even opens and are willing to wait for in excess of an hour.

1. **The plan will create an unacceptable level of pollution.** The level of pollution in the area is already in excess of legal limits. This level of pollution puts the health of local residents at risk and it would be madness to build a school in the midst of such high pollution. I am a liability underwriter by trade and would point out that in future, the planning department would very possibly be found negligent for wilfully ignoring pollution guidance and expressly allowing this problem to be worsened. Should local residents and particularly new schoolchildren develop pollution-based illnesses, it would not be unreasonable to expect local planners/developers to answer to why they ignored all reasonable pollution guidelines and exposed injured parties to foreseeable health risk. This is GBC’s responsibility and you are liable for the wellbeing of the communities you represent and/or impact with your decisions.

Overall, the project will damage the area. It will damage the quality of life of its residents. Local infrastructure cannot support the increase in population density.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/2032  **Respondent:** 10879233 / Claire Riley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A a resident of Send/Ripley I wihs to make the following points:

I object to all erosion of the Green Belt.
I object to any "in-setting" of ANY villages from the Green Belt.
I object to the the amount of development in one area of the borough.
I object to the lack of immediate provision for new schools.
I object to the limited consultation period.
I object to the last minute inclusion of new sites with less than 2 weeks notice.
I strongly object to the lack of any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3026  Respondent: 10879457 / Louisa Scott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the building of 45 houses at Clockburn nursery because of inadequate access and traffic volume. This road is far too narrow to take on more traffic with the junction with Send Road being hazardous when trying to pull out into the main road. there is already a development going ahead including 64 apartments and a marina which will increase congestion in this road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3023  Respondent: 10879457 / Louisa Scott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to plan A43 the inclusion of the 30 hectares of Garlick's Arch in this Plan A43. This site is new and was not included in the Regulation 18 Draft, and has not been consulted on previously. It forms part of the Green Belt and is permanently protected by the NPPF, which is there to prevent the merging of settlements. It also contains around 5 hectares of ancient woodland, some of which dates back to the 16th century the plan includes the building of 400 houses and nearly 2 acres of industrial buildings and warehousing. The ENLA of 2015 shows an 80% reduction in employment space over that of 2013, therefore industrial space at Burntcommon is no longer required. Quite apart from losing Green Belt land, the extra traffic generated by an estate of this size, which will consist of about 800 cars and many HGV's, will put an unbearable pressure on all the roads around the Burntcommon roundabout (A247/B2215), especially at rush hour times. As well as the roads being unable to cope with such huge population growth, neither will the local schools or the Villages Medical Centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3024  Respondent:  10879457 / Louisa Scott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to plan A43A a new northbound slip road to the A3 from Clandon Road and a new southbound off slip from the A3 to A247. The proposal to create extra entry and exit slip roads from the A3, London bound, off the A247 Clandon Road will add grossly to the congestion that is already a big problem at the roundabout and surrounding roads in Send at rush hour.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3025  Respondent:  10879457 / Louisa Scott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the development of 40 houses and 2 travellers pitches at Send hill. the access to this is insufficient as the road is narrow and single track.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/6529</th>
<th>Respondent: 10879457 / Louisa Scott</th>
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I object to the fact that the infrastucture has not been considered and is inadequate to deal with the proposed housing levels and additional traffic

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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- I object to the removal of Send from the Green belt because the village and countryside provide a necessary buffer between Guildford and Woking- there are no special circumstances that can be justified for building on the Greenbelt land. P2

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Guildford plan which has not identified sufficient brownfield sites within the urban area and includes 70% of the proposed housing of 13860 targeted in green belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:-pslp172/4938  Respondent: 10879521 / Peter Loveland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3258  Respondent: 10879873 / Alison Allen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. The developments would mean that the green belt boundaries have to be changed which is contrary to Policy P2: Green Belt and the Countryside which states that the green belt will be protected against “inappropriate development”.

2. The density of the proposed developments is out of character with the rest of the villages and the number of proposed homes would swamp and forever alter the character of the existing villages. The rural character of the village will be lost with the influx of traffic of the car using population.

3. The lanes of West Horsley are small, some narrow, they twist and bend with limited sight lines, and are too small for HGV traffic or other large vehicles which would be much better sticking to the A roads. Any development will swamp the village with heavy lorries during the development phase, breaking up the surfaces of roads which are already in very poor condition, and once the development is over the roads will be swamped with the consequential traffic from the multiple vehicles that every household now owns. At peak hours long traffic queues already develop at every main junction, and with even more traffic this could lead to near complete congestion. The local lanes are at times extremely hazardous for cycling with a number of drivers paying little or no attention to speed limits or where and when it is safe to overtake any cyclist or other slower vehicle and as a committed utility cyclist this is already a huge concern. Further traffic volumes will pose a real problem to the many cyclists who use the local roads. Cycling needs to continue to be safe throughout the local area. Considering pedestrians many parts of the village have narrow pavements and in several places none at all. In Long Reach there are intermittent or no pavements with pedestrians having to walk along the sides of the country lane. The greater volumes of traffic will be a considerable problem for these pedestrians.

4. The Raleigh school in West Horsley has insufficient room for children from the Horsleys at all levels, with children from outside the immediate area compounding the difficulties. More homes in Horsley will make matters even worse. The site for the Raleigh school is extremely cramped and the school is currently feeling forced to search for an alternative site. With any greatly increased population in the village the relocated school is likely to end up oversubscribed once more. Any new homes will just make a bad situation even worse.

5. The current provision of Medical and dental facilities are seriously stretched - they are insufficient for the existing communities. It is extremely problematic to get a Doctor’s appointment when most needed and almost impossible to get on a list for a National Health Service Dentist. Additional homes would put extra stress on the existing facilities.

6. West Horsley has just one shop; the other was closed and converted into flats. No provision has been made for additional shops and services alongside the new homes in the local plan. The shops at Station Parade, East Horsley are mainly visited by car by the local residents and people from the surrounding countryside. The parking at these shops is limited, in addition some people consider it perfectly alright to park on the double yellow lines outside the supermarket causing blockages and impeding junctions - the traffic situation at peak times is already unsuitable, parking for the shops and services in East Horsley could not cope with the influx of new homes/residents.

7. Although it is possible to walk along the Ockham Road along the pavement to visit the shops this is not a the rural experience expected of Horsley but one of a walk along a busy road of vehicles passing close and at times faster than they should. This road is insufficiently wide for two larger vehicles to pass and often wing mirrors of these vehicles overhang the pavement very close to pedestrians. I am aware of one pedestrian who was hospitalised as a result of being struck by a wing mirror whilst on one of these pavements and one of my children has been struck by a car wing mirror whilst walking along the pavement on the Ockham road. The greater increase in volumes of traffic generated by the proposed development and afterwards with the increase in vehicles heading for the village will make it even less likely that people will be safe on these pavements.

8. The waste water facilities would be unable to cope with any additional homes – it can’t cope with the number of homes that are already in the village, overflowing in Ockham Road North, Green lane area.

9. Some of the proposed sites have inadequate surface water drainage as it is – the land gets flooded. Building on such land is just asking for the houses to be flooded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no provision for Garlicks arch so the Plan takes no account of the infrastructure needed for this site. It is therefore not fit for purpose.

Please take these objections into consideration and the Plan is amended.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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3. I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy P1)

I have been a resident in Ripley since 2010 and the weight of traffic has dramatically increased. I am a cyclist so notice this first hand.

At a time of reduced bus services through Ripley and no train stations nearby the cars from the extra houses will clog the already busy roads as the local transport facilities are already inadequate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Proposed Submission Local Plan June 2016

I object most strongly to the Guildford Borough Proposed Submission Local Plan (June 2016)

I list below the main reasons for my objection

1. I object to the not protecting the Green Belt (Policy P2)

I strongly object to removing the villages of Ripley, Clandon and Send from the Green Belt.

In addition the sites of Wisley Airfield and Garlicks Arch must not be removed as their development would wreck the local area creating an urban rather than a green environment. As required by the National Planning Policy there are no exceptional circumstances for the above sites being removed from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2377  Respondent: 10880257 / Carolyn Whitfield  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

2. I object to the Local Plan as the proposed development is not sustainable (Policy S1)

The 13,860 extra houses is not sustainable, my village of Ripley and local villages of Send and Clandon will be damaged, we don’t need these extra houses in our local area. The plan lacks any infrastructure improvements for Garlicks Arch. This development must surely be more suited to an urban area with transport already on hand.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5746  Respondent: 10880449 / Emma Holland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A22

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
To whom it may concern,

I am writing to object to the current plan for the development of Keens Lane.

Having moved to Tanglely Lane 3 years ago with the purpose of living in peace and quiet with no street lights and little traffic I am very upset that this development has been proposed on green belt land which I assumed would be safe from development!

My first issue is we applied for planning permission for an extension which was initially turned down because of the impact on the green belt, I would like someone to explain how an extra metre on the side of my house was turned down but it is now ok to ruin a large greenbelt site for 140 houses opposite my house?

Secondly we regularly see Deer using this area passing from Whitmoor common, I’d like to understand what impact this will have on the local wildlife and what provisions have been put into place for them? We also have lots of Bats which I know are in the old stable buildings on this site, what will happen to them?

Finally the traffic on the Aldershot road as well the Worplesdon Road towards the town centre is already heavily congested in the mornings, adding additional traffic from here will make mornings harder for us all!!!

I hope these comments and objections are listened to?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Anyone with an ounce of sense would realise that Tannery lane is a narrow bendy road joining Send Road at a dangerous junction with two schools within a 500 meter radius. The traffic in Send, at peak hours, is heavily congested and additional traffic emerging from Tannery Lane will only make matters worse. The congestion is the result of bottlenecks at both the Burnt Common and Old Woking roundabouts. The traffic in Send has already been exacerbated by the recent planning permission for 64 apartments and a marina further down Tannery Lane. A ridiculous idea!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Anyone with an ounce of sense would realise that Tannery lane is a narrow bendy road joining Send Road at a dangerous junction with two schools within a 500 meter radius. The traffic in Send, at peak hours, is heavily congested and additional traffic emerging from Tannery Lane will only make matters worse. The congestion is the result of bottlenecks at both the Burnt Common and Old Woking roundabouts. The traffic in Send has already been exacerbated by the recent planning permission for 64 apartments and a marina further down Tannery Lane. A ridiculous idea!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to building 45 houses at Clockbarn Nursery. The traffic in Send is already heavily congested and further traffic emerging from Tannery Lane will only make this worse. Traffic improvements at the junction will not help, as the congestion is the result of bottlenecks at both the Burnt Common and Old Woking roundabouts. Planning permission has already been granted for 64 apartments and a marina further down Tannery Lane which will impact future traffic so to consider further development cannot be justified. Tannery Lane is a narrow and bendy road joining Send Road at a very difficult and potentially dangerous junction.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPS16/6542</th>
<th>Respondent: 10880481 / James Anderson</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This area is an ancient woodland and subject to flooding! There are plenty of brownfield sites already available in the borough! Slyfield is the main industrial centre of Guildford Borough so why create another one? In addition, Guildford’s housing plan requirements have been shown to be grossly exaggerated with the council refusing to release their calculations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPS16/6606</th>
<th>Respondent: 10880481 / James Anderson</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to building 400 houses and 7000m² of industrial space at Garlick’s Arch. There are plenty of brownfield sites already available in the borough, Slyfield is already the industrial centre of Guildford Borough so why create another one particularly as there is an excess of industrial space in the area at the moment and for the foreseeable future. This site is ancient woodland and subject to flooding!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6544 Respondent: 10880481 / James Anderson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

interchange at Burnt Common this will choke Send Road and the Village with additional traffic to and from Woking. This will create a new rat run into Woking from the A3 and the M25. Send Road will also have to contend with the additional traffic from the proposed 2000 houses at Wisley, 2000 houses at Gosden Hill and the 1850 houses at Blackwell farm. This on a road that is already heavily congested.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6610 Respondent: 10880481 / James Anderson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a new interchange with the A3 at Burnt Common. My previous points already highlight the fact that Send Road is heavily congested especially at peak times Noise and pollution levels, already extremely high, would become much worse! By creating a new interchange at Burnt Common this will choke Send Road and the Village with additional traffic to and from Woking. This route through Send is likely to become a rat run to Woking from the A3 & M25 and in addition would have to contend with additional traffic from the proposed 2000 houses at Wisley, 2000 houses at Gosden Hill and 1850 houses at Blackwell farm.

I trust you will consider the above comments and those of all the other residents in Send and the surrounding villages who feel strongly about the proposals and wish to preserve their communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Yet another ridiculous idea! As with the Clockbarn proposal, the effect of the additional traffic on the already congested Send Road will be significant and unacceptable. Send Hill is also a narrow residential lane and will be badly affected by the additional traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the development of 40 houses and 2 travellers’ pitches at Send Hill. Send Hill is a narrow width residential lane and will be badly affected by the additional traffic. As with the Clockbarn proposal, the impact of the additional traffic on the already congested Send Road will be significant and unacceptable.
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

government gave a clear election promise to protect the Green Belt. The current proposals renege on those promises. There are no special circumstances to justify Send losing its Green Belt status; it acts as a buffer to separate Guildford from Woking and therefore it is essential that its Green Belt status be retained.

1. The Green Belt is not something that can be taken away by unrealistic Government targets; greedy property developers or a spineless Borough Council who prefers to develop in the areas that they believe will give them the least resistance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13848  Respondent: 10880481 / James Anderson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Send being removed from the Green Belt. The Green Belt was intended to be permanent, as required by the National Planning Policy Framework, and I am not aware of any special or extenuating circumstances which justify abandoning it. There was a clear election promise by local councilors & central government to protect the Green Belt and the he current proposals renege on those promises.

1. Send’s Green Belt acts as a buffer to separate Guildford from Woking it is essential that its Green Belt status be retained. If this is lost Developers will be quick to take advantage and there will be nothing to stop them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1615  Respondent: 10880481 / James Anderson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
As a resident of Send I object at the proposals put forward in the Local Plan. The residents of Send have already put forward their views during the consultation process with the Borough Council and from these proposals they have been totally and utterly ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1621  Respondent: 10880481 / James Anderson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I am writing to raise my objection as I am disgusted at the proposals put forward in the Local Plan. The plan should be the result of the consultation process between the Borough Council and its residents, but it appears that the residents views put forward during the process have been totally ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3989  Respondent: 10880609 / S. Groves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7430  Respondent: 10880609 / S. Groves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42
I OBJECT to the building of 45 houses at Clockbarn Nursery because of the inadequate access and increased traffic volume. Tannery Lane is far too narrow and winding, with limited passing places and visibility, to take any further traffic loads. The junction with Send Road is already over-crowded and hazardous both when turning in to Tannery Lane, or exiting on to Send Road. Planning permission has already been granted for 64 apartments at the Tannery and for building the Marina, both of which will already create additional burdens on the tiny lane and its traffic load and further development will only exacerbate this situation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the building of 7000sq metres of industrial space and 400 houses at Garlick’s Arch opposite Send Marsh Road. The site floods regularly and is covered by ancient woodland, up to 500 years old, which is home to a variety of wildlife. The industrial space is not required and the additional heavy loads of commercial traffic will need to pass through Ripley village in order to gain access to the A3 and M25. There is already provision for commercial space at Slyfield industrial estate and this should be fully developed before additional sites within Green Belt locations are used. With regards to the 400 houses at Garlick’s arch, the currently existing brownfield sites within Guildford and its surrounding areas should be fully utilised before any housing is agreed within Green Field sites. Guildford has refused to share the methodology behind calculating the upcoming housing requirements and therefore no weight should be given to the use of these calculations when planning additional housing capacity.

I further OBJECT to the development at Garlick’s Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks’ notice and without any prior consultation and is not required in terms of housing need either for the village or the borough.

I further OBJECT to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to a new interchange with the A3 at Burnt Common. Send would need to accommodate the traffic for the proposed 2000 new houses at Wisley Airfield, 2000 new houses at Gosden Hill, Burpham as well as the 1850 proposed new houses at Blackwell Farm. Much of the traffic between these sites, the A3 and M25 would need to pass through the already congested roads in Send and Send Marsh, which are already overloaded with existing local traffic. Noise and pollution levels within Send and Send Marsh are already at excessive levels and the proposed interchange would only worsen this situation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7432  Respondent: 10880609 / S. Groves  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the development of 40 houses and 2 Travellers’ pitches at Send Hill. It is an inappropriate location because the narrow width, single access country road provides insufficient access. The subsoil of the proposed site contains documented unsafe landfill waste registered at GBC. Any development of this site would spoil a high amenity area set in beautiful countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16530  Respondent: 10880609 / S. Groves  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the fact that infrastructure requirements have not been properly considered at any point in this proposed Local Plan, and are inadequate to deal with proposed increase in housing levels. Roads, public transport, availability at doctor’s surgery and places within schools will be unable to cope with the increase in housing and population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16529  Respondent: 10880609 / S. Groves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Send Village being removed from the Green Belt. The Green Belt was intended to be permanent, as required by the National Planning Policy Framework, and there are no special circumstances to justify abandoning it. Send’s Green Belt provides an essential buffer stopping Woking and Guildford becoming one large conurbation. Local councillors and central government gave a clear election promise to protect the Green Belt and this plan reneges upon that election promise. Developers will be quick to take advantage of the removal of Send from the Green Belt and then there will be nothing to stop further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16531  Respondent: 10880609 / S. Groves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

I OBJECT to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<tr>
<th>Comment ID: SQLP16/1834</th>
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<tr>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I OBJECT to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPA16/4539</th>
<th>Respondent: 10880993 / Roger Knee</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I object to there being no evidence whatso ever as to the alleged need for housing at the stated figure. It is excessive.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/4507</th>
<th>Respondent: 10880993 / Roger Knee</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45</td>
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</table>

I object to site A43 Garlicks arch.
I object to site A43, the on/off ramps at clandon. As with above, this will cause great traffic problems in land villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPS16/4516</th>
<th>Respondent: 10880993 / Roger Knee</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57</td>
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I object to site A45 The Talbot. I believe this is overdevelopment in a conservation area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9804</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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</table>

I object to site A57 Rose Lane- development in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to there being no immediate provision for:-
New schools
More GP services
How will RSC cope?
Highways will be totally inadequate and local areas will become gridlocked during the rush hours and virtually all day.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/9768  Respondent: 10880993 / Roger Knee  Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all erosion of the Green Belt.
I object to the removal of all villages from the Green Belt. GBC has NO MANDATE to take this action.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/9799  Respondent: 10880993 / Roger Knee  Agent:</th>
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<tr>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to what seems to be disproportionate disguise of development in my area of the borough. I also do not believe existing brown fields sites are being considered properly.

I object to very limited period of consultation. We are being treated with contempt in this.

I object to the decidedly last minute inclusion of new sites with than two weeks notice. This is not proper.

GBC has a clear need to take care of the interests of the residents not just of today but also future generations. The Surrey that I know and love and have lived in for nearly 40 years will be destroyed by there ill thought out plans. I urged it to face up to the fact that it has got it badly wrong.

Can GBC really claim to represent residents?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/3216  **Respondent:** 10881217 / Ben Stevens  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to the Draft Local 2016 Plan specifically to the removal of Send, Ripley and Clandon from Green Belt status as housing development should NOT constitute “very special circumstances”.

The Government stated, in a letter by Housing and Planning Minister Brandon Lewis, that “demand for housing alone will not change Green Belt boundaries”. The National Planning Practice Guidance states that “unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances justifying inappropriate development on a site within the Green Belt”.

I also object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because I do not believe it is justified by any “special circumstances” and the fact that Green Belt is meant to be permanent and not continually eroded. Most people live here because it is a Green Belt area because they love this very special amenity. In addition to this, people have probably paid a premium to live here - again because it is such a beautiful place to live.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/3217  **Respondent:** 10881217 / Ben Stevens  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send
I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3492  Respondent: 10881217 / Ben Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

I am writing to object to the Draft Local 2016 Plan and in particular, I wish to object very strongly to the removal of Send from the Green Belt. This green countryside between Woking and Guildford is the reason that it is such a pleasant and attractive place to live and work even though the roads are often very congested.

I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill. I cannot see how this could be justified by any “special circumstances” and I would like to add that Green Belt is meant to be permanent and not continually eroded.

I object to the development at Garlick’s Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks’ notice and without any prior consultation and is not required in terms of housing need either for the village or the borough.

I object to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan.

The “housing need” figure of 13,860 is far too high and results in the completely unnecessary development of our Green Belt. The way students, economic need and affordability are calculated inflates the housing need. Students are only part time residents in Guildford needing one bedroom in shared housing units and they will not be wanting to live in houses in the villages.

I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.

I also object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the (A247) would be gridlocked all day.

I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.
I object to building 45 houses at Clockharn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.

I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

I object to the vast development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.

I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

I believe that these housing developments and the proposed changes would change the nature of this beautiful area forever – an area I have loved growing up in and one I would eventually love to invest in myself when I am able to buy a property. Our villages are being asked to accept a disproportionally high number of Guildford’s housing needs and I do not feel that this need is evenly shared throughout the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6354  Respondent: 10881217 / Ben Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the vast development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPS16/6352  Respondent: 10881217 / Ben Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The reason I object to building 45 houses at Clockbarn is because of inadequate access and traffic volume. Tannery Lane is far too narrow and winding to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6350  Respondent: 10881217 / Ben Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development at Garlick’s Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks’ notice and without any prior consultation and is not required in terms of housing need either for the village or the borough.

I also object to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. In any case, it is an area of ancient woodland which is prone to flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send. The A247 would be permanently gridlocked. The traffic issues we residents face on a daily basis should not be underestimated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6353  Respondent: 10881217 / Ben Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object to the development of 40 houses at Send Hill due to the subsoil of the existing site which contains documented unsafe land fill waste which is currently vented. In addition, the proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13270  Respondent: 10881217 / Ben Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I believe that your decision to destroy our precious Green Belt with these housing developments, the industrial site and the other proposed changes would change the nature of this beautiful area for ever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I believe that a few years ago when I was at school in Burpham, a local 10 minute journey would frequently be disrupted by traffic on the Send Road, the A3 and also the slip road into Burpham. Even though we would leave extra time for rush hour traffic, the smallest of incidents would mean this journey time could creep up to three or four times as long. The local bus companies will confirm this as students on the buses were let off detentions as it became such a common complaint. The only time that traffic does improve is during holiday periods and the Summer months when fewer students are in school because of exam study leave. This means that demands on the roads are not as high but of course this is only for a short time during the year.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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The only time that traffic does improve is during holiday periods and the Summer months when fewer students are in school because of exam study leave. This means that demands on the roads are not as high but of course this is only for a short time during the year.

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Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3053  Respondent: 10881217 / Ben Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A42 change at Clockbarn in Tannery Lane. The plan to build sixty homes instead of the 45 originally suggested is ridiculous. This is a 33% increase instead of a reduction of 33% which would suit that particular site. Sixty houses are far too many. It would ensure that current traffic problems in Tannery Lane are worsened and also a large building development there will add extra surface water will add to the flooding issue which exist on that site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3055  Respondent: 10881217 / Ben Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 at Burnt Common. Why is an industrial development required when there are empty sites and industrial units, at Slylield and in Guildford?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp171/1404  Respondent: 10881217 / Ben Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy 2 at paragraph 4.3.15. I do not think Send Business Park should be inset from greenbelt land. It is in a beautiful quiet rural lane in an area of outstanding natural beauty which is why we all have chosen to live and work here. There is highly restricted vehicular access along Tannery Lane in both directions and as it is. This is, and should remain an area of outstanding beautiful countryside adjacent to the Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1310  Respondent: 10881569 / Nicola Douet  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am a West Horsley resident and I am extremely concerned about the proposals. We moved here for the community life and the open spaces. Increasing the housing to such a density will remove so much of our green spaces and erode the village community that is so precious to so many. What of those who visit for the walks and cycling and to holiday here? This is not a case of "not in my back yard". Of course more housing (including affordable housing and smaller units for the young and those who wish to downsize within the village) is required but the number of dwellings proposed will completely alter the character of West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Roads:

The roads in West Horsley would struggle to cope with the increase in traffic. For example, The Street is the only entry into West Horsley from the A246. It is narrow in places and it would not be possible to widen it and it can be very difficult to pass large vehicles such as lorries, tractors, buses and school buses, which frequently use this road.

Pedestrian traffic does not fair any better. In most cases it would not be possible to widen pavements. The increased traffic levels would be hazardous for pedestrians. Traffic will increase considerably as a result of the proposed housing estates. Most houses have 2 cars and some have 3. Journey times on local roads will increase considerably. No detail on roads and transport infrastructure in West Horsley has been found in any of the Local Plan documents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The scale of potential development in West Horsley is excessive and is not supported by the Guildford Borough Economic Strategy 2013 - 2031. West Horsley is remote from the existing centres of employment and the new Economic Development Site proposals which are focussed on the opposite side of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The expansion of West Horsley village is unsustainable. There is only one small shop, no post office and a sparse week day only bus service through the village which would not be sufficient to serve the high volumes of housing being proposed. The development of nearly 400 homes (an increase of 35% on the current number of dwellings) on the 4 proposed sites are at a far higher density than currently exist. No sound reasons have been given for the proposed changes to the settlement boundaries, which appear to be aimed solely at increasing the land available for additional development.

Public Transport: Horsley rail station is a very busy station. The car park is usually full on week days; unless it is expanded it will not support such a large increase in vehicles. There would also be increased traffic to & from the station to drop off & pick up travellers including school children going to Guildford and Leatherhead. At an exhibition about the proposed development of Wisley airfield I was told that there were no plans to increase the car park capacity at Horsley station.

Schools: What is the estimated increase in the number of school places? Any provision for additional places must be in place before any houses are built. Surrey County Council has a statutory duty to ensure appropriate school commissioning and provision. The Raleigh school serves both East and West Horsley and is full every year plus a waiting list. Will the new Howard of Effingham School have greater capacity? If yes, will it meet the needs of the increased population West Horsley? If no, then this needs to be urgently addressed. What consultation has there been between Guildford Borough Council and Surrey County Council?

Local facilities: (Shops, health services, playgrounds, library, community buildings and spaces) There is one local store in West Horsley and parking for 4-5 vehicles. The shopping area at East Horsley is vibrant, thriving and well used. However, parking can be difficult with the car park often close to capacity. This would only be exacerbated by an increase in traffic and I believe would ultimately put people off shopping there. If people cannot park they will take their custom elsewhere meaning a huge loss of custom to the local businesses.

I am not against all development and I agree that more housing, especially smaller properties and affordable housing is needed but it MUST be in keeping with the locale and not at the cost of the current landscape and community. And the infrastructure needs to be in place before any housing is built.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5214  Respondent: 10881569 / Nicola Douet  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The sites proposed in West Horsley are currently within established Green Belt. The policy on protection for the Green Belt is contained in section 9 of the National Planning Policy Framework, which sets out the fundamental aim of Green Belt policy. Policy on development in Metropolitan Green Belt is set out in paragraphs 79 - 92 of the NPPF. Inappropriate development is, by definition, harmful to Green Belt and the NPPF states that it "should not be approved except in very special circumstances". Local planning authorities are advised to "regard the construction of new buildings as inappropriate in Green Belt".

The Framework also states that a Green Belt review should only happen in "exceptional circumstances". This concept is further elaborated as being "for example when planning for larger scale development such as new settlements or major urban extensions". The Green Belt in Surrey is established with detailed boundaries, therefore "exceptional circumstances" must be demonstrated to necessitate the change to its boundaries. No exceptional circumstances or other justification have
been made for the proposed new Green Belt boundaries. There are identified brownfield sites in the borough which have not been seriously considered in the borough plan.

Policy P2 of the Guildford Plan states that Guildford Borough Council "will continue to protect Metropolitan Green Belt against inappropriate development." I am totally opposed to the removal of West Horsley from the Green Belt by insetting and the extension of boundaries and believe that the proposed development is wholly inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5221  Respondent: 10881569 / Nicola Douet  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Drainage, sewers etc.:

A number of areas in West Horsley are subject to frequent flooding; for example The Street near the railway bridge is very susceptible to flooding and on occasions last winter even the school buses could not get through. East Lane is subject to flooding where it abuts site A41. With the removal of the open field to soak up rain fall, this will only run-off onto East Lane causing more serious flooding on the road surface.

This risk will increase if the vast amount of building proposed goes ahead and natural drainage is concreted over. No detail on waste water infrastructure in West Horsley has been found in any of the Local Plan documents.

Thames Water have commented that the current waste water network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. The Draft Guildford Borough Infrastructure Delivery Plan 2016 also identifies a significant Surface Water Flooding hotspot in and around West Horsley. Without the preparation of a drainage strategy to determine the exact impact on the infrastructure and the significance of the infrastructure to support the development, the deliverability of the proposed housing development is unclear.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14830  Respondent: 10881921 / Christine Brockbank  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing in connection with the proposed plans to build extensively on green belt land in the area. I strongly object to these plans. The green belt should be sacrosanct in maintaining the balance between urban landscape and countryside.

Any change in the status of the green belt will result in changing forever the landscape of England. Although appreciative of the need for additional, affordable housing it is unlikely that homes built in the Surrey area will be within the reach of young people.

The infrastructure does not appear to have been considered in these plans, but are clearly necessary for transport links to working areas or schools and shops for families.

Additionally the council has not made the case, satisfactorily, to change the status of the green belt. If this should be done it will forever change the area of Surrey; what a legacy to leave our children and future generations?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1960  Respondent: 10881921 / Christine Brockbank  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the proposed plan for massively increasing the number of houses & industrial spaces on GREEN BELT LAND.

I object to changing designated Green Belt into designated Future Development land.

I would also like to state my disgust at the total contempt shown towards the people living in the area, by the council, who have clearly and demonstrably ignored all the concerns raised over past plans by proposing plans that will be far more damaging to the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1849  Respondent: 10882081 / Alice Taylor-Peat  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM)

I am writing to object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous years.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 3% of the population of GBC).

- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

- I object to the detrimental impact on transport, local roads and road infrastructure. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
  2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
  3. The increased availability of this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion to the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted limits. Additional traffic will exacerbate...
this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.
  - I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning Officers, who cited the same grave concerns highlighted in this letter.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I would like these objections to be fully considered and for the Wisley Airfield (Three Farms Meadows), Allocation A35, to be removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2883   Respondent: 10882113 / Amanda Stevens   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object in the strongest terms to the removal of Send, Ripley and Clandon from the Green Belt.

It was my understanding that the Government stated, in a letter by Housing and Planning Minister Brandon Lewis, that “demand for housing alone will not change Green Belt boundaries”. Indeed National Planning Practice Guidance states that “unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the ‘very special circumstances justifying inappropriate development on a site within the Green Belt’.

Therefore, I was absolutely horrified to learn of your intention to “inset” or rather REMOVE Ripley, Send and Clandon from Green Belt status in order to circumnavigate this difficulty and I strongly object. It is apparent that you have no respect for the National Planning Practice Guidance and you appear to have little respect for the general members public who live, work and pay their council tax in this area. I reach this conclusion because it seems you are prepared to ride roughshod over any commitments by Government to preserve the Green Belt for future generations.

As an ordinary member of the public, I had absolutely NO idea that you had classified different areas of Green Belt into areas of sensitivity i.e. those you would be prepared to lose from the Green Belt and those areas you wouldn’t. I feel absolutely furious as well as utterly betrayed because I do not feel this has EVER been made clear to the general public.
Many of us have chosen specifically to live in and invest in houses here because we adore living in this area surrounded by beautiful countryside and I am one hundred percent certain we have paid a premium for doing so.

I can see that the reason that you wish to remove the land around these villages from green belt status is for expediency. I can see how it would be an easy solution for you but once removed, you will have changed the character of our villages for ever thereby having a dramatic affect on their desirability as places to live and work. It is a decision that will never be able to be reversed.

I object to the 400 house development that has been planned at Garlick’s Arch and I object to the 7,000 sq meter industrial site. I feel that the impact of such an enormous development in Send is completely disproportionate and will cause absolute chaos at the Burnt Common/Shell roundabout which is already often congested in the mornings and evenings as people vie for access to and from the A3. In addition to this of course it will only add to the current congestion on the A3 which for anyone who lives here is a daily battle.

I also object to the high number of 45 houses being built at Clockbarn because I understand that planning permission has already been granted for 65 houses at the Tannery which means there will be a further 110 houses inSend with all the extra traffic that will bring down Tannery Lane which is narrow and winding - not to mention all the additional traffic congestion along Send Road.

I object to the 40 houses being built at Send Hill. I understand that the subsoil of the existing site contains asbestos which could give rise to all sorts of health problems for those living there and nearby if this is disturbed.

I strongly object to the way that student housing is included in the calculation of housing needs for permanent residents. To use this fluctuating population which drops for up to six months of every year (4 months over the Summer and 2 more at Christmas and Easter) as a reason would have a dramatic effect on our Green Belt and yet we all know NO students will want to live out in the surrounding villages.

I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3. This will ENSURE gridlock on the A3 for everyone at ALL times of the day rather than between the hours of 7.30 am to 9.30 am and again in the afternoon from 2.30 (yes, it often starts that early!) to 6.30pm - often later. This will mean that because the A3 will be at a standstill - so too will all the surrounding roads as people seek to find alternative routes.

I also object to the failure of GBC to identify sufficient brownfield sites within the urban area which should first be targeted for development which would enable residents to use the railway networks to and from work.

Please confirm receipt of my objections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1298  Respondent: 10882113 / Amanda Stevens  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy 2 at paragraph 4.3.15. I do not think Send Business Park should be inset from greenbelt land. It is in a beautiful quiet rural lane in an area of outstanding natural beauty which is why we all have chosen to live and work here. There is highly restricted vehicular access along Tannery Lane in both directions and as it is, we have articulated lorries travelling up and down this lovely country lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/862  Respondent: 10882465 / Colin Bowes  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

All,

I am writing to object to the inclusion of Green Belt land in the local plan.

I believe there are enough suitable alternatives.

I note several councillors campaigned for election with a manifesto that included preservation of the green belt. I expect my elected representatives to fight against any use of the green belt.

In particular I object to the inclusion of Three Farms Meadow in the Local Plan. Only a few weeks prior to the local plan being published the proposed development was unanimously rejected on numerous counts. These difficulties will not be overcome in the short or medium term, and I believe the council should not invest further time or money trying to fix this inappropriate development.

Para 80 NPPF purposes of Green Belt

Para 80 of the NPPF states that Green Belt serves (inter alia) “to check the unrestricted sprawl of large built-up areas”; and ‘to prevent neighbouring towns merging into one another’. However in the subjective opinion of the GBCS TFM does not to check the unrestricted sprawl of large built-up areas – when taken out of the Metropolitan and strategic context. The Probit in Planning Code of Conduct enjoins Councillors to be ‘objective’ and to ‘uphold the law’. It is objectively the case that TFM does ‘check unrestricted sprawl of large built-up areas and does ‘prevent neighbouring towns merging into one another’. The fact that those large built-up areas and neighbouring towns are in the adjacent boroughs of Elmbridge, Woking and Mole Valley should not exclude them from consideration by Guildford Borough Council.

The plan below illustrates how TFM does serve to separate neighbouring towns and check the sprawl of large built-up areas: (see pdf attachment)

(For the avoidance of doubt the distances cited are taken from Google maps and are ‘as the crow flies’ not the actual distances by road.)

TFM fulfils ALL of the purposes of the Green Belt. It did when it was first put into the Green Belt and circumstances have not changed since:

1. to check the unrestricted sprawl of large built-up areas;
TFM prevents north-south sprawl from London suburbs down to Guildford and east-west sprawl from Woking to Leatherhead. Specifically it stands between the suburbs of Leatherhead (Fetcham and Bookham) and the suburbs of Woking.

1. to prevent neighbouring towns merging into one another;

TFM prevents 12 neighbouring towns and villages across 4 boroughs merging.

1. to assist in safeguarding the countryside from encroachment;

The site is at the centre of a connected natural landscape.

1. to preserve the setting and special character of historic towns; and

Three Farms Meadows sits at the heart of Ockham Village in the parish of Ockham. Ockham has 3 conservation areas and 31 listed buildings and is arranged in 9 historic settlements.

1. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

70ha out of 114ha is good quality agricultural land in active cultivation – as it has been for centuries. It includes at least 45.4ha of Best and Most Versatile agricultural land. Building on this does not assist urban regeneration.

The GBCS appears to run the argument that if a plot of land is not the very last plot to stand between two towns then that particular plot does not serve the purpose of separating the towns. That is a bogus and illogical argument. Taken to an absurdity it would imply that only the last blade of grass between two towns served to separate them.

One of the justifications for removing the site from the Metropolitan Green Belt that has been cited is the analysis carried out in the Green Belt and Countryside Study. This compares different sites on the basis of the ‘purposes’ of the Green Belt set out in the NPPF. Those particular criteria are neither the only relevant criteria nor necessarily the best. The purposes set out in the NPPF are necessarily abstract – because it is necessary that they can be applied to every Green Belt in the country. The NPPF description of the purposes of the Green Belt was not intended to be an exclusive list. It was not intended to imply that purposes not on that particular list were wholly irrelevant and could be safely wholly disregarded.

**Overriding purpose of the Metropolitan Green Belt in serving London**

Every Green Belt is unique and has an overriding purpose over and above these five abstract criteria – namely to protect the particular city or metropolis for which the particular Green Belt was set up. Since TFM was put into the Green Belt to protect Metropolitan London it is also highly relevant how it fulfils that particular overriding purpose.

The GBCS does not ask the question, how does TFM serve London – the metropolis for which the Metropolitan Green Belt exists and the reason why TFM was originally put into the Green Belt. It should. It is in fact the primary and the concrete purpose of this Green Belt. TFM in fact performs an essential purpose within the Metropolitan Green Belt – standing in a strategic position between London and Guildford and between Woking and Leatherhead as this plan shows:- (see pdf attachment)

The economic geography of London and its satellite towns has depended on commuting for some two hundred years and especially since the invention of the train and the car. The system works because London is separated from its satellite towns by green space. This allows fast transit times between the two. If the green space is filled in then the efficiency of the entire system will rapidly deteriorate as congestion clogs the free and efficient movement of people and goods. The signs of such congestion are already much in evidence on the A3 and on the M25 which carry many thousands of vehicles every hour.

Apart from the purposes set out in the NPPF, TFM also fulfils many other important, material and relevant purposes which the GBCS has not considered. Among these are its Environmental and its Heritage purposes. As it is immediately adjacent to a Special Protection Area and a Site of Special Scientific Interest and as it is itself an SNCI, it serves to protect those
nature reserves and forms an essential and integral part of a connected living landscape—connecting the nature reserves to other ancient woodland and serving as an important wildlife corridor. And TFM is also at the very centre of the parish of Ockham. Ockham has never been a nuclear village with one defined centre. It is a collection of nine hamlets and the centre of those hamlets is TFM— which is why Ockham Parish Council has submitted an application for TFM to be made an Asset of Community Value. This youtube video describes a little of Ockham’s history: https://youtu.be/VVnUUDSxKJk

Before removing TFM from the Green Belt the law requires that ‘exceptional circumstances’ are shown. Residents of Ockham have yet to be shown any rational exceptional circumstances.

Is the proposed new Green Belt in Ash qualitatively equivalent in terms of checking sprawl and preventing towns merging? How is it strategic to the Metropolis of London? What are the exceptional circumstances required by law to justify creating new Green Belt in Ash? New Green Belt in Ash is not a substitute for the unique qualities of the Green Belt in Ockham, which should be preserved and protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Picture attachments Colin Bowes.docx (281 KB)

Comment ID: pslp172/3288   Respondent: 10882465 / Colin Bowes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

TFM Allocation A35 has already been unanimously rejected by the planning authorities on numerous counts. It is a waste of resources—paid for by the electorate via council tax—to maintain this site in the local plan. I am profoundly concerned that the council has failed to remove this site from the local plan even though it received thousands of objection from local residents and statutory consultees.

Assumptions and claims made in the plan regarding Allocation A35 are unsound. Regarding traffic increases, the site is adjacent to the most consistently congested stretches of strategic road network in the county and close to one the most congested junction in the country (J10). I had to use this junction for years on my commute to work, and it is frequently at a standstill during rush hours, accidents, diversions or roadworks. To suggest using bus services is disingenuous. The buses either travel the already congested main roads, or travel on unsuitable minor roads—thus reducing the likelihood of pedestrians or cyclists wanting to use these same minor roads. Furthermore, it is next door to Wisley RHS Gardens where following recent upgrades and extensions visitor numbers will increase by 500,000/annum and this associated traffic increase from the RHS has not been taken into account. I object to the transport evidence base which is unreliable. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights and timings. The inclusion of A35 will not contribute to the 5-year housing projection due to this and other constraints notably sewerage capacity.

This is Green Belt Land, and Green Belt is there for a reason. Many councillors and national politicians have made election promises to protect our Green Belt. The removal of an additional 3.1 ha from the green belt without any justification is just not morally right. The increased area of the TFM site now abuts additional heritage assets, including Upton Farm and Bridge End House negatively impacting the setting of these buildings and the wider Ockham Conservation Area. The
increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB. I object to paragraph 22 as this does not reflect the impact of the buildings on the surrounding area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1579  Respondent: 10882465 / Colin Bowes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In terms of the requirement for housing, I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. and the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels. Policy S2 states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1580  Respondent: 10882465 / Colin Bowes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In terms of the requirement for housing, I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. and the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels. Policy S2 states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** pslp17q/298  **Respondent:** 10882465 / Colin Bowes  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** (No)

Assumptions and claims made in the plan regarding Allocation A35 are unsound. Regarding traffic increases, the site is adjacent to the most consistently congested stretches of strategic road network in the county and close to one the most congested junction in the country (J10). I had to use this junction for years on my commute to work, and it is frequently at a standstill during rush hours, accidents, diversions or roadworks. To suggest using bus services is disingenuous. The buses either travel the already congested main roads, or travel on unsuitable minor roads – thus reducing the likelihood of pedestrians or cyclists wanting to use these same minor roads. Furthermore, it is next door to Wisley RHS Gardens where following recent upgrades and extensions visitor numbers will increase by 500,000/annum and this associated traffic increase from the RHS has not been taken into account. I object to the transport evidence base which is unreliable.

It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights and timings. The inclusion of A35 will not contribute to the 5-year housing projection due to this and other constraints notably sewerage capacity.

This is Green Belt Land, and Green Belt is there for a reason. Many councillors and national politicians have made election promises to protect our Green Belt. The removal of an additional 3.1 ha from the green belt without any justification is just not morally right. The increased area of the TFM site now abuts additional heritage assets, including Upton Farm and Bridge End House negatively impacting the setting of these buildings and the wider Ockham Conservation Area. The increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB. I object to paragraph 22 as this does not reflect the impact of the buildings on the surrounding area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/565  **Respondent:** 10882785 / Stephen Fleming  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

16. I object to the number of 693 new houses proposed in the Local Plan for each year. The numbers calculated in accordance with the SHMA do not reflect true local need and have been inflated by the way students, economic need and affordability have been calculated.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>I object to the insetting of Ripley.</td>
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<td>I object to the erosion of the Green Belt in clear contravention of the Government's and Conservative councillors' election manifesto promises to protect the Green Belt. In particular, I object to Send being removed from the Green Belt (Policy P2) as Send provides a buffer between Woking and Guildford.</td>
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I object to the insetting of West Clandon

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Comment ID: PSLPA16/567</th>
<th>Respondent: 10882785 / Stephen Fleming</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I object to all sites in West Horsley for over 5 homes. The proposed sites will merge the villages of Ockham, West and East Horsley creating urban sprawl.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPS16/786</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
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10. I object to the inclusion of the planned development of 2000 houses at Gosden Hill Farm, Merrow (Policy A25) in clear contravention of the Government's and Conservative councillors' election manifesto promises to protect the Green Belt. I object to the unsustainable nature of the site, the poor air quality and noise pollution levels that will result and the infrastructure deficit that will result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPS16/792</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A26</td>
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<td>Comment ID: PSLPS16/785</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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27. I object to proposed development of 1,800 houses at Blackwell Farm

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPS16/788</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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9. I object to the inclusion of Three Farm Meadows (Policy 35) due to the proposed removal of the site from the Green Belt when no exceptional, very special or special circumstances exist. In particular, I object to the unsustainable nature of the site, the poor air quality and noise pollution levels that will result, the infrastructure deficit that will result and the impact on views to and from the Surrey Hills.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

15. I object to the building of 45 houses at Clockbarn Nursery, Tannery Lane (Policy A42) on the grounds of inadequate access to and from the site. The roads surrounding the site are already hazardous, narrow and windy. Tannery Lane has already had planning permission granted for 64 houses and a marina and the location will not be able to cope with any more traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPS16/784  Respondent: 10882785 / Stephen Fleming  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. I object to the inclusion of land at Garlick's Arch, Burnt Common and the proposed 400 houses and 7000 sq m of industrial warehousing on that site (Policy 43). Policy A43 and A43A were included at the last minute. They were not in the Regulation 18 draft and had not been consulted upon prior to the inclusion 2016 Local Plan.

5. I object to the impact of Policy A43 on ancient woodland on that site, on noise pollution and air pollution levels. The site is also prone to flooding.

6. I object to the impact of Policy A43 and A43A on local infrastructure. Congestion levels on A247 are already increasing at an alarming rate and will be further exacerbated by the development of Garlick's Arch as the residents will have to rely on the use of private cars.

7. I object to the unsustainable nature of the site at Garlick's Arch (Policy 43).

8. I object to the inclusion of policy A43 of 7000sq m of industrial warehousing as the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft. Slyfield Industrial Estate still has spare capacity and could accommodate any additional warehousing need if required.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/783  Respondent: 10882785 / Stephen Fleming  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Following the approval of the revised Local Plan by the full council of Guildford Borough Council on 24th May, I would like to make it clear that I object to the provisions set out in the Local Plan as they threaten to destroy the established nature and identity of our villages by building on Green Belt land and will add considerably to the already unacceptable levels of traffic on the A3, A247 and M25 and many other roads in the borough.

In particular, I object on the following basis.

1. I object to the creation of a new 4 way interchange onto the A3 on the A247 (Policy A43A) as this would add to the ever increasing levels of traffic on the A247, A3 and through Send and Clandon. Send would become a through route to and from the A3 and will become gridlocked all day.

2. I object to the impact that Policy A43A will have on the air quality for those living in the surrounding areas and for future generations.

3. I object to the impact on residents that the resulting noise pollution of Policy A43A will have.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

11. I object to the inclusion of land west of Wind Ridge and Send Hill designated for 40 homes and 2 Travellers' Pitches (Policy A44). The site was not included in the Regulation 18 draft and has not been consulted upon prior to the inclusion in the 2016 Local Plan.

12. I object to the impact of Policy A44 on an area of beautiful Green Belt countryside.

13. I object to the impact of Policy A44 as the subsoil of the existing site contains documented unsafe land fill waste which is currently vented.

14. I object to the impact of Policy A44, which includes 2 Travellers' Pitches, on the local infrastructure. The narrow width single track country road provides insufficient access for the pitches.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
17. I object to the impact of further congestion on local village roads and lanes.

18. I object to the impact of excessive development on the A3 and M25 on air quality. The air quality in many parts of the borough is greater than EU permitted levels and will damage the health of residents and future residents.

19. I object to the fact that 70% of the proposed 13,860 houses are designated on Green Belt land along the A3. This will result in gridlock on the A3, the A247 and the surrounding roads which are already at capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

29. I object to the impact that additional residents will have on local roads, health services, education spaces and policing needs.

30. I object to the failure of Guildford Borough Council to include the Town Centre Masterplan 2015 in the Local Plan and to find sufficient brownfield sites for development prior to considering sites within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

20. I object to the inadequate protection of the environment.

21. I object to the fact that insufficient consideration has been given to the harm that will be caused to the Special Protection Area, the Sites of Special Scientific Interest and the borough's Conservation Area and heritage assets.

22. I object to the impact of poor air quality on the Special Protection Area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1628  Respondent: 10882785 / Stephen Fleming  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

28. I object to the allocation of sites in unsustainable locations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18203  Respondent: 10883201 / Danny McHugh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18210  Respondent: 10883201 / Danny McHugh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18211  Respondent: 10883201 / Danny McHugh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18200  Respondent: 10883201 / Danny McHugh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18201  Respondent: 10883201 / Danny McHugh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18202  Respondent: 10883201 / Danny McHugh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18213  Respondent: 10883201 / Danny McHugh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment “Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B and B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.
4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

Attached documents:

Comment ID: PSLPP16/18209  Respondent: 10883201 / Danny McHugh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university’s ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18208  Respondent: 10883201 / Danny McHugh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford’s relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18212  Respondent: 10883201 / Danny McHugh  Agent:
**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3**

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions. The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being ‘closely related’. In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure
will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy II requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18205  Respondent: 10883201 / Danny McHugh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have
considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 and M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18206  Respondent: 10883201 / Danny McHugh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18198  Respondent: 10883201 / Danny McHugh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public
consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of ‘About Guildford’ (published by the Council) on page 5 states that ‘... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.’ This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. 
There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt and Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18199  Respondent: 10883201 / Danny McHugh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18196  Respondent: 10883201 / Danny McHugh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)</th>
</tr>
</thead>
<tbody>
<tr>
<td>The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.</td>
</tr>
<tr>
<td>The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.</td>
</tr>
<tr>
<td>Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.</td>
</tr>
<tr>
<td>The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.</td>
</tr>
<tr>
<td>This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.</td>
</tr>
<tr>
<td>The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.</td>
</tr>
<tr>
<td>The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.</td>
</tr>
<tr>
<td>The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsustainable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.</td>
</tr>
<tr>
<td>The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.</td>
</tr>
</tbody>
</table>
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18197  Respondent: 10883201 / Danny McHugh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”.

Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guilford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

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The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon and Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4417  Respondent: 10883201 / Danny McHugh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

C.i. Policy 25 Gosden Hill – My Objections

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4430  Respondent: 10883201 / Danny McHugh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

C.ii. Policy A43 Garlick’s Arch – My Objections

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.
12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.
13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.
14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon.
The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp171/2874  Respondent: 10883201 / Danny McHugh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

E. Policy S1 Presumption in favour of Sustainable Development– My Objections

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp17q/549  Respondent: 10883201 / Danny McHugh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

G. Duty to Cooperate – My Objections

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to cooperate with the wishes of its own electorate.

Despite the thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1253  Respondent: 10883553 / Steven Davis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

No regard for smaller local villages, this settlement will dwarf them all in size and change local area forever. The infrastructure - particularly schools and hospitals - has not been sufficiently expanded to account for the 2000 extra homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2507  Respondent: 10883553 / Steven Davis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Ripley should not be removed from the green belt. It provides a necessary buffer from the urban sprawl of London. It is important villages separate boundaries are maintained to preserve the village’ way of life’ in this area of Surrey. The attraction of this area of Surrey is its green areas around small villages with individual identities. Please don't sacrifice this for a few extra homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6604  Respondent: 10883585 / J M Starr  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to object to the inclusion of various sites suggested for housing and limited infrastructure, within your most recent local plan, but in particular to the inclusion of the former Wisley airfield. On almost the same day as the Council planners rejected unanimously the inclusion of this area, it is still included in your latest plan. Why? It must be painfully obvious to the entire Council that there is no possibility of sufficient infrastructure to accommodate development of this site, either now or at any time in the foreseeable future. The roads within reach of this site are incapable of supporting any additional traffic, including both the A3 and M25.
It must surely also be obvious that there are already insufficient primary or secondary school places available nor the means to transport pupils along narrow country lanes to any existing school which might be built elsewhere. The only two railway stations within normal reach have absolutely no spare parking facilities and nobody in their right mind would attempt to walk or cycle to either station along such dangerous country lanes.

It beggars belief that you are proposing to more than double the size of Ockham, Wisley and Ripley combined with your latest proposals for this area and I object in the strongest possible terms.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/5751  **Respondent:** 10883713 / Matthew Howse  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

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**Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings**

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars

1. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads

1. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements

1. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)

1. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest

1. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<tr>
<th>Question</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
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**Answer (if comment is on questions 1-7 of the questionnaire):**

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<tr>
<th>Paragraph</th>
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<tbody>
<tr>
<td>4.3.13</td>
<td>Policy P2 proposes that East Horsley be inset from the green belt. East Horsley is set in a rural location and its green belt status has preserved that rural character. Between 2000 and 2015 incremental development of brownfield and infilling sites has seen 149 new homes built in the village, so sensible development is welcomed within the “washed over” status of East Horsley. 36% of East Horsley is woodland which, together with its low density housing and large gardens, give those open spaces that are vital to the character of the greenbelt. Why would GBC wish to destroy this character?</td>
</tr>
</tbody>
</table>

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/1094  
**Respondent:** 10883841 / Gillian Millership  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? | ( ) | is Sound? | ( ) | is Legally Compliant? | ( ) |

**Answer (if comment is on questions 1-7 of the questionnaire):**

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<th>Paragraph</th>
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<td></td>
<td>I am concerned with the scale of house building being proposed by GBC. The local plan target proposes a 25% increase in housing stock whereas the ONS projects a need for only an increase of 15% for Guildford Borough. Much of this new housing development is at the expense of the metropolitan green belt. Once it is built on it will be lost for future generations. Your Proposed Submission states that “We will continue to protect the Metropolitan Green Belt”, however some 65% of developments will be made on land that is currently green belt. How do you explain this contradiction? I therefore object to the Proposed Submission Local Plan. In particular I would like to comment on the following Strategic Policies</td>
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<tr>
<th>Strategic Policies</th>
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<tr>
<td>S2</td>
<td>GBC is pursuing a policy of Forced Growth with 65% of new developments on land that is currently green belt. The electorate have not been made aware of this policy. It is not government statistics driving the huge number of new houses to be built, rather it is a deliberate GBC policy.</td>
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</table>

| | I hope that GBC will not force through a Local Plan that does not have the support of its residents. I object to the Proposed Submission Local Plan. |

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** pslp173/100  
**Respondent:** 10883841 / Gillian Millership  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

East Horsley to be inset from the Metropolitan Green Belt - I OBJECT

East Horsley settlement boundaries to be redrawn - I OBJECT

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/226  Respondent: 10883841 / Gillian Millership  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

GBC plans to increase its housing stock by 22% despite ONC forecast of only a 10.4% population growth - I OBJECT TO THIS PROPOSED INCREASE OF 22%

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1997  Respondent: 10883905 / Anita Marshall  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The infrastructure required to support proposed housing development in the villages to the north of the borough – Ockham, and the Horsleys, Ripley, Send, simply does not exist, and as such cannot possibly be created by cynical developers to such a huge scale. Roads, schools, railway network, drainage, parking, surgeries etc. etc. are already under huge pressure, as well you know. Moreover you have received many reports to confirm these inadequacies.11
7. Your Planning Committee has already rejected proposed development at Wisley, (Three Farms Meadows) - where is the logic/integrity in continuing to include it in the Proposed Local Plan?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/4260</th>
<th>Respondent: 10883905 / Anita Marshall</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
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<td>The threat to Ockham, in particular, where I have lived for several decades is horrific. You propose to turn this “Rural Oasis” (as one of your former Chief Executives called it), into a high density housing settlement, more in keeping with a new town than a Domesday village.</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>Guildford Borough Council Proposed Local Plan (June,2016)</td>
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<td>I wish to lodge my objections to the Draft Local Plan:-</td>
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<tr>
<td>1. I object to new housing being built on the Green Belt.</td>
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<td>2. I object to former Wisley Airfield being removed from the Green Belt. (Now referred to as “Three Farms Meadows”)</td>
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<th>Respondent: 10883905 / Anita Marshall</th>
<th>Agent:</th>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. I object to a plan proposing that 70% of your housing “need” should be built on Green belt sites; there being absolutely no “exceptional circumstances” to justify such a stand, whilst the regeneration of existing brownfield sites is the obvious path to follow.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/777  Respondent: 10883905 / Anita Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. I believe your housing calculations – 693 per annum to be questionable, and in need of clarification in order to make them more acceptable and transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/410  Respondent: 10883905 / Anita Marshall  Agent:


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)
I wish to object to the Local Plan which I consider to be unsound and not fit for purpose.

1. I object to the proposed extended developments within the Green Belt – there are no “exceptional circumstances” which could possibly justify the potential development of such a large area of protected land to the NE of the borough.
2. I object to housing numbers, which also appear to be unsound. Again, you have ignored Green Belt constraints.
3. I object to the lack of consideration given to infrastructure, especially in the case of the former Wisley Airfield, which is close to already congested highways. Your Highways Report is unsound. Services are already creaking and many oversubscribed.

I fully support the objections submitted by WAAG, and Ockham and Ripley Parish Councils which are too numerous for me to include, nevertheless I wish my objections and those of the above organisations to be fully taken into consideration and that you amend the Plan accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is more than enough brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban expansion from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and is in fact more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and
many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars. Routes to the closet railway stations are not navigable by foot as there are no pavements and the unitl roads make cycling dangerous.
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for numerous reasons including:

It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.

It is further from railway stations than any other identified strategic site.

It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10).

Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc).

Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.

Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.

It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.

- The associated traffic increase from the RHS has not been taken into account.
- The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account.

There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.

The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.

It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.

The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”

Opportunity (3) should be common to all sites and is not unique to this site.

I object to the increased area of the site as this now abuts additional heritage assets, including Upton Farm and Bridge End House negatively impacting the setting of these buildings and the wider Ockham Conservation Area.

I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16).

I object to the removal of additional 3.1 ha from the green belt without any justification.
I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.

I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.

I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

I object to the extension of the plan period by 1 year as it has not been identified as a major change.

I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development. I particularly object to the reliance on the Carter Jonas study update 2017 which includes “demand” for retail space from companies already in administration.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 10884481 / Ruth Gregory</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Affordable housing:

It is a shame that the areas deemed as sites for affordable housing will mostly, due to the prices of houses around the areas, be out of reach for many of the skilled workers you are trying to attract. The houses are also not all easily and cheaply accessible to the main Guildford area, leaving people more reliant on cars and increasing the traffic into and out of the main towns.

The average key worker is on a salary of approx £26000 year, on a salary of this most homes in this area are out of reach. Even looking at schemes to help people buy property, to get a mortgage on this salary would be difficult.

If you are trying to attract workers to meet the lack of unqualified care staff in this area, to enable the higher than normal number of older persons within Surrey to be cared for in their own homes or care establishments, then the cost of the homes will have to be affordable to this level of salary too, approx £17,000. Something that will be difficult to achieve within the areas highlighted.

Affordable housing should be open to all, and because of the presumed cache of living in the green and pleasant area of Surrey, with the benefit of closeness to London, I am afraid that this will not happen. Leaving the current residents and workers of Guildford to again lose out to people who primarily benefit London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I believe that this has gone through consultation already and been rejected.

It still does not address the many issues highlighted in the previous consultation, nor does it make any reference to the fact that it was refused.

I still have concerns about the increase in traffic, the benefits to the local community and the actual ability of the planners to guarantee homes that will be affordable to the local population and not just to London commuters.

If you are planning to take the local villages out of the green belt due to the lack of green space around them, then this, and the other planned developments around this area, will help with this plan.

if you keep planning on building on the green areas and not considering the environmental factors then of course how can we consider them to be part of a 'green belt'.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/43  Respondent: 10884481 / Ruth Gregory  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

If you are planning to take the local villages out of the green belt due to the lack of green space around them, then this, and the other planned developments around this area, will help with this plan.

if you keep planning on building on the green areas and not considering the environmental factors then of course how can we consider them to be part of a ‘green belt’.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4689  Respondent: 10884545 / Sarah O'Hagan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4691  Respondent: 10884545 / Sarah O'Hagan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4694  Respondent: 10884545 / Sarah O'Hagan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to
build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

15. 1. I object to the potential impact of para 4.4.23a on Burnt Common with its over allocation of industrial zoning is subterfuge for a waste management facility which is a dishonest and underhand approach to planning and proper consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the former Wisley Airfield now known as Three Farms Meadows.

Allocation A35 for the phased development of a new settlement of up to 2100 dwellings.

I object to the draft local plan for the following reasons:-
I object to the threat the local plan poses to the historic rural village and the blight on properties there.

I object to the detrimental impact on transport, local roads and road safety.

I object to the fact that insufficient consideration has been giving to the environmental and ecological value of the site.

I object to the continued inclusion of the site now known as Three Farms Meadow where the planning application has already been unanimously rejected by Guildford planning committee.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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My response to the local plan submission with regard to the A35 site

I object to this development because it will add a further three thousand vehicles to local roads causing more pollution, noise and congestion. The impact on quality of life will be very serious indeed.

I object to the highly inconsistent green belt and countryside study, it is misleading.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPA16/3432</th>
<th>Respondent:</th>
<th>10884897 / Eric Voller</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
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</tbody>
</table>

I object to Guildford Borough Council not disclosing how the number of 13860 houses required in the Borough was calculated.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Page 422 of 2167
Comment ID: PSLPP16/14053  Respondent: 10884897 / Eric Voller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that 14 villages are proposed to be removed from the Green Belt and also that village boundaries are proposed to be increased, to allow for more development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14051  Respondent: 10884897 / Eric Voller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed provision of 2000 houses plus travellers sites and Car Park at Gosden Hill Farm (Burpham-West Clandon) and to 2000 houses being built at Wisley in the plan (Wisley application has already been turned down, but remains in the Plan) Both of these schemes together will produce thousands of more cars on already congested roads. These schemes, will both especially effect BURPHAM, which is already grid locked daily. This will also increase pollution.

These additional 4000 houses will overstretch doctors surgeries, hospitals, schools and the whole infrastructure of Guildford.

I object to the proposed use of Brownfield sites for the use of business and shops. Brownfield sites should be used for housing. (Affordable housing preferably)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/237  Respondent: 10884929 / Kim Mackenzie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have written before about the various proposals issued so far for the local development plan, especially concerning the East and West Horsley area where I live.

My views have not changed.

Whilst I understand the need for modest and appropriate development, I do OBJECT to:

• The overall extent of the currently proposed development (500+ houses in the 2 villages) and the impact on us of 2000 houses on Wisley Airfield.
• The fact the current infrastructure (roads and other services) cannot cope now with the loads placed upon it, and no clear plans to enhance these in the future
• The loss of green belt land around the villages. These village boundaries should NOT be extended.

I have worked extensively in recent years for the local community (including running the Horsley Community Bus), and have gained a strong sense of the preferred way forward for this area, which is NOT the way implied by the present proposals.

Please TAKE STEPS to keep this as a RURAL area before it is too late

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4282  Respondent: 10884929 / Kim Mackenzie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

PLEASE LOOK AGAIN AT THE NEEDS OF THE RESIDENTS, PAST AND FUTURE.

They are the lifeblood of any community. Ignore them, as appears to be your intent now, and you will rapidly destroy what has taken centuries to create for the benefit of all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We do accept modest development plans, but

I OBJECT MOST STRONGLY TO:

The huge amount of development proposed in the Horsley villages and the neighbouring areas, totally out of proportion to any defined need. Our infrastructure services (transport, schools, medical facilities and social services) are already overloaded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

The totally unnecessary proposal to remove the Horsleys from the Green Belt. The Green Belt has been the mainstay in controlling urban sprawl in the past. Why might this happen? Please do not destroy it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The extension of the settlement areas of the Horsleys. To meet what need? Or is it simply to facilitate planning approvals for future plans?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4276  Respondent: 10884929 / Kim Mackenzie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have previously written on two or more occasions regarding the various drafts of the Guildford Local Plan, specifically how it affects East and West Horsley, my home villages. On studying the latest Plan, I FIND I MUST WRITE YET AGAIN.

It does appear no notice has been taken of so many reasonable and logical complaints that have been sent to you in the last 2 years.

I have been lucky to live in East Horsley for over 30 years, and have served the villages for 15 years driving and managing the Horsleys Community Bus. I mention this as this has been a great way to get a feeling for what residents need and want and think. The people concerned cover all works of life, many of them more needing local support. In essence we live in a large village area, almost a small town, but which retains its village character but the efforts and hard work of so many residents, mainly on a voluntary basis. We care about our village, and want its character to remain. There is no evidence the amount of new housing is needed in the area, and well exceed the nationally imposed target levels.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/495  Respondent: 10884993 / Dave Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour onto the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/496  Respondent: 10884993 / Dave Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **I OBJECT** to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)
Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/497  Respondent: 10884993 / Dave Fassom  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1103  Respondent: 10884993 / Dave Fassom  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1100  Respondent: 10884993 / Dave Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1101  Respondent: 10884993 / Dave Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1102  Respondent: 10884993 / Dave Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1110  Respondent: 10884993 / Dave Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that
order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 10884993 / Dave Fassom</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1109  Respondent: 10884993 / Dave Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1104  Respondent: 10884993 / Dave Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.
I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

1. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1106  Respondent: 10884993 / Dave Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1098  Respondent: 10884993 / Dave Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1099  Respondent: 10884993 / Dave Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I OBJECT to the Borough Wide Strategy (Policy S2)

2. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

3. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

4. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4711  Respondent: 10884993 / Dave Fassom  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/636  Respondent: 10884993 / Dave Fassom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1871  Respondent: 10885313 / B. Hazel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We would like to make the following comments on the new Guildford local plan.

We object to the proposal to remove the Horsleys from the green belt.

The local infrastructure such as local schools and medical facilities are already over stretched. Roads and car parks are overloaded especially the Ockham road south. We see no reasons for the extension of the boundaries of the settlement area of the Horsleys.

We object to the proposal to build over 2000 houses at the former Wisley Airfield as its less than 2 miles away from the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1762  Respondent: 10885633 / Catherine Jackson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inflated “housing need” figure of 13,860 which would result in the unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3467  Respondent: 10885633 / Catherine Jackson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to building 45 houses at Clockbarn because of inadequate access and increased traffic volume this would create. Tannery Lane is a narrow lane that couldn’t sustain more traffic. Plus the junction with Send Road is already very hazardous for vehicles trying to turn onto the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

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<td>I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.</td>
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<td>I object to all this additional housing as the traffic on Send Road is heavy enough and there is a lack of provision for safe crossing on this road and a lack of speed control making it dangerous, particularly for children, who wish to cross this road to utilise the park facility. More houses will mean more traffic and increased risks to our children.</td>
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<tr>
<td>I object to 13,860 houses being built on the Green Belt along the A3 because it will cause gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3821  Respondent: 10889825 / Suzanne Tyler  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am a resident of East Horsley and wrote in detail with my objections to the 2014 Local Plan. My concerns remain considerable and are summarised below:

The "exceptional circumstances" which need to be demonstrated before removal from the Green Belt have not in fact been demonstrated. Similarly the extension of the defined settlement boundaries have not been justified but appears to be an attempt to by-pass planning control for future unspecified additional development.

The existing roads ( in particular the very narrow stretch of the Ockham Road North between Pennymead and the junction with the A246 by the Duke of Wellington pub) are already dangerously overused by the current volume of cars and large lorries (often from the construction trade) and an increase of a projected 6000 cars (based on 2 cars per household if permission is granted for all the proposed new developments) will inevitably lead to an increase in accidents and deterioration of already dilapidated and constricted roads, which cannot physically be widened to make them safer. It has become increasingly difficult to park in the village, either in marked bays or even the car parks, and this lack of parking will be exacerbated by the disproportionate increase in new housing.

The current infrastructure is already at breaking point in East and West Horsley - the village state and private schools are over subscribed and it is already very difficult to see a GP promptly at the village medical practice. The increase in pollution from the extra houses and car emissions will increase asthma symptoms and other allergies also leading to an increased use of and strain on the Medical Centre and its staff. An increase of 35% in the number of West Horsley households will place a further strain on the inadequate drainage and will worsen the already significant flooding that occurs regularly on East Lane and beyond the Barley Mow pub.

The increase in housing, demolition of existing long standing landmark sites in the Horsleys and removal of the green belt status is fundamentally changing the nature of a rural Surrey village, that current residents have chosen to live in: the Chown houses and Lovelace historic buildings will be detracted from and, in time demolished no doubt to make way for lucrative new developments. Horsley Towers will lose its setting as houses are built adjacent to it and Thatchers hotel is demolished, leaving the historic Chown frontage looking out of place surrounded by modern houses. The disproportionate number of houses is changing a village into a suburb of Guildford and, without the fields and green spaces for which it is
renowned, it will soon morph into urban sprawl and the treasures of the National Trust at Hatchlands and Clandon Park will be mere islands in a suburban landscape which few outside the area will wish to visit.

There is a much stronger economic, infrastructure and social case for building houses on such a vast scale on the University side of Guildford, which is in need of redevelopment, no green space will be sacrificed and where existing transport links are strong and appropriate already.

I sincerely hope the views of local, long-standing residents of the Horsleys will be given due consideration and that further consultation locally will take place before the character of the village is corrupted in perpetuity.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<td>The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<th>Comment ID: PSLPA16/1639</th>
<th>Respondent: 10889985 / Ruth Macdonald</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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| - The “objectively assessed need” figure of 693 homes a year is too high.  
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.  
- The current SHMA inflates the proposed housing figure due to  
  - failure to correct for errors in the historical data for international migration flows, | |
The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/4550  Respondent: 10889985 / Ruth Macdonald  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough as being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough. It is over double the previous figure of 322 used in previous plans. The SHMA report methodology is, I believe, inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3145  Respondent: 10889985 / Ruth Macdonald  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve: it provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land, all requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery and schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour onto the A3 which is already stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day, and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could do virtually whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.
Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime, given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and roads like the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill with which health and safety issues are associated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3146  Respondent: 10889985 / Ruth Macdonald  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to make the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brownfield site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments with sustainable transport. With ever reducing bus services in the area and no railway station within reasonable walking distance, it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)
It is clear that with this site being added at the 11th hour no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylons run through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3147  Respondent: 10889985 / Ruth Macdonald  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The addition of north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6848  Respondent: 10889985 / Ruth Macdonald  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site which, incidentally, includes over 80 ancient oak trees.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is, in the scheme of industrial development, relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Comment ID: PSLPP16/6846</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.
Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four already existing successful rural businesses which have been in existence for over 30 years plus a further two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm and absolutely not where such things should happen at all.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers in East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6852  Respondent: 10889985 / Ruth Macdonald  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in the town and there would be no need to build on the Hog’s Back.

Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
| Comment ID: PSLPP16/6856 | Respondent: 10889985 / Ruth Macdonald | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/6849 | Respondent: 10889985 / Ruth Macdonald | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow, only being wide enough for one vehicle at a time. The main “pinch point” on The Street in West Clandon is a case in point: lorries travelling in opposite directions cannot pass each other and, when faced with a lorry, even cars need to mount the pavement to get past. In addition, the road surfaces are in a poor condition.

I OBJECT most vigorously to the development proposed in the local plan which will result in more traffic using these narrow roads leading to further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever more popular pastime, particularly at weekends, with hundreds of cyclists passing through the local villages on their way to the Surrey Hills. With no proper cycle lanes on the narrow roads surrounding the
villages, and with greater vehicle traffic being generated from these developments, there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk of injury of the public. In the case of West Clandon, The Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements as mentioned above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6850  Respondent: 10889985 / Ruth Macdonald  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to, capacity such as the electrical network and sewers. Without plans to improve these services there should be no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send, will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services even further and is unsustainable.

There is no provision made for what will be the necessary increase in capacity of the Royal Surrey Hospital, Guildford. Where is this assessed and how will it be remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6851  Respondent: 10889985 / Ruth Macdonald  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Page 456 of 2167
There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6853  Respondent: 10889985 / Ruth Macdonald  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough, will lead to considerable further congestion despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6842  Respondent: 10889985 / Ruth Macdonald  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with the sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires that there be an exceptional circumstance for the Green Belt boundaries to be altered, as for any development on the Green Belt. There are no exceptional circumstances for these villages as mere housing need does not constitute a ‘special circumstance’ for encroachment on the Green Belt. Once taken, the Green Belt is lost forever.

There is a real danger that the loss of this Green Belt would result in urban sprawl and the neighbouring villages merging together. The significant development proposed for these villages will result in the character of these villages being completely lost and the surrounding countryside encroached upon. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, especially for the villages between Guildford and the M25, including Ripley, Send and West Clandon. Not only will the services in these villages be unable to cope with the level of development proposed, the proposed developments themselves do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are constantly being reduced. Residents will have no option but to rely on their cars. These sites are totally unsuitable due to being unable to access sustainable transport. Furthermore, the Infrastructure Plan shows no plans to improve the infrastructure for Garlick's Arch. Residents will have to rely on their cars for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical and sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from significant congestion. Further vehicle movements will only result in ever more acute congestion and increased pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6841 Respondent: 10889985 / Ruth Macdonald Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Borough Wide Strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall Housing Figure, which would be more reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

1. The Housing Number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
2. The Housing Number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West. All of these lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes
from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial and so, therefore, are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites of over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation of Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

C.i. Policy 25 Gosden Hill – My Objections

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in
conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.

7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).

8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4597  Respondent: 10889985 / Ruth Macdonald  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

C.ii. Policy A43 Garlick’s Arch – My Objections

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion and are our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.
23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4598  Respondent: 10889985 / Ruth Macdonald  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

C.iii. Policy A58 Burnt Common – My Objections

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potentially newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

15. I object to the potential impact of para 4.4.23a on Burnt Common with its over allocation of industrial zoning is subterfuge for a waste management facility which is a dishonest and underhand approach to planning and proper consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3039  Respondent: 10889985 / Ruth Macdonald  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

E. Policy S1 Presumption in favour of Sustainable Development– My Objections

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/599  Respondent: 10889985 / Ruth Macdonald  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

G. Duty to Cooperate – My Objections

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to cooperate with the wishes of its own electorate.

Despite the thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/965  Respondent: 10890049 / P R Coombes  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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APPENDIX C

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
• Failure to correct for errors in the historical data for international migration flows,
• Issues with the way it considers students and affordability and
• Flaws in the method for estimating the number of homes needed to support job growth.

- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3305  Respondent: 10890177 / Cheryl Burnside  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints
should have been applied. Secondly I believe the Council did not properly consider constraints and that their
decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt
sites should not be included in the plan unless “exceptional circumstances” for development are proven in
relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term
considerations such as perceived housing need, as case law has established. There needs to be a specific
balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very
special circumstances which are argued in favour of development at that particular site. There is no evidence this
has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it
cannot be met without building on Green Belt then there is no need for any further consideration and any
congruent Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/6449  **Respondent:** 10890177 / Cheryl Burnside  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**POLICY A25 - Gosden Hill Farm**

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford.
Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development
proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too
narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching
Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from
Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the
Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of
West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too
narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
• Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015
• 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016
• 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
• 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
• 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.
The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent:</th>
<th>10890177 / Cheryl Burnside</th>
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POLICY A43 AND A43a – Garlick’s Arch

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.
It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.
I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**POLICY D3**

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY D3

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13521  Respondent: 10890177 / Cheryl Burnside  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13493  Respondent: 10890177 / Cheryl Burnside  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY E1

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13495  Respondent: 10890177 / Cheryl Burnside  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.
There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/13498  **Respondent:** 10890177 / Cheryl Burnside  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY E5**

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/13525  **Respondent:** 10890177 / Cheryl Burnside  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY E6**

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For
example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.
4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13517  Respondent: 10890177 / Cheryl Burnside  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable
residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**POLICY H1**

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.
It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13515  Respondent: 10890177 / Cheryl Burnside  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H2

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of £360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13523  Respondent: 10890177 / Cheryl Burnside  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY II

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy II)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy II. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and...
unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/13509</th>
<th>Respondent: 10890177 / Cheryl Burnside</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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**POLICY I3**

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<tr>
<th>Comment ID: PSLPP16/13489</th>
<th>Respondent: 10890177 / Cheryl Burnside</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.
This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13491  Respondent: 10890177 / Cheryl Burnside  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual
probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the
flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-
commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13486  Respondent: 10890177 / Cheryl Burnside  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running
through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework.
Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying
sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the
area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy
does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be
taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate
developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach
of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government
policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of
sustainable development in practice and is one of the most important factors affecting sustainable development in the area
covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the
Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least
one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank
rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development
bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of
sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF
paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National
Planning Policy.
The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. The same is true of Guildford itself with all approach roads grid-locked at certain times of day. The cost to business of congestion is huge with the adverse consequences impacting residents through health damaging air quality and road accidents. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result. No one is asking for a 40% increase in retail in Guildford, expect maybe Retailers, yet that will exacerbate the adverse effect of more traffic coming to Guildford. Car parking charges must be increased in line with cities like Cambridge if GBC is serious about reducing congestion. A tunnel under the A3 will be hugely expensive and the money would be better spent improving rail travel between Portsmouth and London and the rail and bus links to adjacent locations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/13487  **Respondent:** 10890177 / Cheryl Burnside  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**POLICY S2**

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”.

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Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints.
It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brownfield sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  SQLP16/1592  Respondent:  10890177 /  Cheryl Burnside  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  SQLP16/1594  Respondent:  10890177 /  Cheryl Burnside  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford’s circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and
foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented counselors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.
The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp173/147  **Respondent:** 10890177 / Cheryl Burnside  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp173/146  **Respondent:** 10890177 / Cheryl Burnside  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Comment ID: pslp171/391  Respondent: 10890177 / Cheryl Burnside  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any rationale.

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/392  Respondent: 10890177 / Cheryl Burnside  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy I1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of proper infrastructure planning for sites (Policy I1)

The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/395  Respondent: 10890177 / Cheryl Burnside  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
<table>
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<tr>
<th>Comment ID: pslp171/385</th>
<th>Respondent: 10890177 / Cheryl Burnside</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P4</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the extended development in the Green Belt (Policy P2, Site A43)

I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/6453</th>
<th>Respondent: 10891265 / Jillian Berton</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I strongly believe that the Horsley’s should remain in the green belt as it has thus been designated for many years past.

Surely there should not be any plan for such a complete and radical wrecking of the whole village environment which will leave a catastrophic effect in many ways on people’s lives and affect children’s appreciation of their surroundings and also have its effect on the whole Surrey landscape and on natural habitats of wild creatures and would involve the destruction of valuable and massive trees so necessary for health and wellbeing of all live beings.

It appears that this plan will have a big effect on the whole area overloading the already stretched in all aspects – transport, good roads, medical facilities, drainage etc. as mentioned. Reduction of housing numbers, A 2000 house village at Ockham’s Wisley Airfield seems just wrong on a site from where so many men gave up their lives for the battle of Britain for a green and pleasant land to remain, it would be better if just a very few houses could be built there, with a small but significant public memorial to those who made a supreme sacrifice in WW2.

This is what people need to have.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<tr>
<th>Comment ID: PSLPP16/865</th>
<th>Respondent: 10892097 / Steve Whatley</th>
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1. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy II)

There is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that.

The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses means dangerous and unsustainable traffic.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/864</th>
<th>Respondent: 10892097 / Steve Whatley</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
1. I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with the site at Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/866  Respondent: 10892097 / Steve Whatley  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/863  Respondent: 10892097 / Steve Whatley  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities do not need these houses at Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick’s Arch.

The development should be in urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/1018  Respondent: 10892097 / Steve Whatley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I Object to the Policy A43 change at GarlicKs Arch because:

There is no proven demand for Travelling Showpeople plots in this location.

No Exceptional circumstances exist to remove this area from the green belt.

It would be an overdevelopment of our village with an excessive number of homes.

It is subject to frequent flooding and not suitable for building.

It will cause excessive traffic which will cause major congestion to Send & Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/1019  Respondent: 10892097 / Steve Whatley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I Object to Policy A58 at Burnt Common because:

There is a decline in the need for industrial areas of this type.

Slyfield & Guildford still have empty sites and industrial units.

The increase in commercial traffic will cause major congestion.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<th>Comment ID: PSLPA16/3728</th>
<th>Respondent: 10892161 / Georgina Price</th>
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The proposed amount of new housing actually needed in the area has apparently been inflated by using the Strategic Housing Market Assessment (SHMA). This number which is only based on a consultant’s mathematical model and not revealed to the local plan, is then increased even further by Guildford Borough Council to give a highly inflated suggested population increase. This is potentially 70% higher than official estimates for the growth of population within the Borough. The scale would mean an increase in a huge 35% of existing West Horsley households. This is higher than any other single area in the Borough.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<tr>
<th>Comment ID: PSLPS16/7061</th>
<th>Respondent: 10892161 / Georgina Price</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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This development has been already refused planning by Guildford Borough Council and must not be allowed. Again the local infrastructure is just not able to cope with the potential of an additional 4,000 cars on local roads. This would have a hugely detrimental impact on to the villages of East and West Horsley, as well as the same problem outlined in item 3 of the overloading of roads, flood risks and added strain on station carparking, doctors surgeries and schools. This area is adjacent to one of the busiest and most accident generating stretches of the A3 as it joins the M25 and more traffic using this section would make matters worse.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I understand that due to a misreading of the type of facilities at the Station Parade, that this small village area could become reclassified as a ‘District Centre”, which would open it up to inappropriate development in the future. To visit the Station Parade would show that this is a thriving parade of village shops, including independent cafes and businesses, as well as bank, and chemist, and a small Budgens. The Budgens is small enough to be able to trade unrestricted hours on a Sunday. There is a library and family run butchers as well as two cafes, both independent. Any future development on a large scale would mean that the smaller businesses would be pushed out in favour of larger retail conglomerates. The whole nature of the village would be changed and we would lose a valuable and vibrant village centre. I understand that the decision to form a district centre in East Horsley would be made on the basis of a misreading of the nature of the facilities here. There is no room for any development here, and no room for the extra car parking that that would generate. This is a very concerning issue.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. Infrastructure in Overload

The local infrastructure just cannot cope with any more housing or retail development in the area on this scale. There is a severe drainage issue in this area, with standing water already making driving hazardous during wet weather. The various schools in the area generate high levels of traffic, and the route through the villages have become rat runs from the A3 to the A246 and beyond. Try making a right turn out of Ockham Road South onto the A246 during rush hour. It’s a serious accident waiting to happen with cars attempting to use the driveway of the Duke of Wellington pub as a cut through to avoid the mounting queues of waiting cars. The proximity to the petrol station also situated on that junction makes it an extremely dangerous manoeuvre. Increased traffic from more housing, and more businesses will be intolerable for the...
community. The local schools are stretched to bursting point and the doctors’ surgery is also overloaded and there doesn’t seem to be any mention in the local plan of improving these vital services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This would be very detrimental leaving both the Horsleys exposed to the spread of urbanization from all sides. The two distinct areas of West and East Horsley would lose their separate identities and merge with each other, and the creeping tide of development would engulf from Effingham, and Bookham, and, if it were to go ahead, the new proposed development of over 2000 houses in Ockham. The green belt must not be removed from the Horsleys and the ‘exceptional circumstances’ that are required to be shown before taking this drastic action have not been demonstrated. The Horsleys lie adjacent to the area of the Sheepleas, a designated Area of Natural Beauty, Site of Special Scientific Interest, and Local Nature Reserve. To allow unchecked development to the south of this beautiful and special place should removal of the green belt be proposed, would be truly sad. The area is well loved by visitors from far and wide, not just from the local area, who come to enjoy the natural beauty of these ancient woodlands, and undisturbed meadows. But the other areas of more ordinary green space, the fields, the hedges, the patches of woodland, the wildlife corridors, are all very special, and deserve just as much protection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/15718</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Extension of the boundaries of the settlement areas of the Horsleys

This is just another to increase more areas into the village settlement, in the hope that more land will become available for development, and again will increase the size of our two villages to ridiculous proportions, bearing in mind the lack of infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The primary thought regarding development must be that this area is our only remaining one close to London where urban dwellers can come to enjoy a day in the country. This area in the last few years has already become grossly overpopulated with the result that is my opinion.

No more countryside in the Guildford area should be built on at all.

I live in Shere which I have seen double in size in the last half century

It is up to you to keep what remains of our unique landscape for the future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

N/A

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: SQLP16/940   Respondent: 10892353 / Robert Wilson   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

N/A

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: SQLP16/941   Respondent: 10892353 / Robert Wilson   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

N/A

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: SQLP16/942   Respondent: 10892353 / Robert Wilson   Agent:
I object to the Policy A42 change at Clockbarn in Tannery Lane because:

- It shows an increase of 15 houses on the original, already agreed, 45.
- The Local Plan (H1) has shown a DECREASE in demand for houses by 39 houses per annum from 2018 - 234. Despite this Send's allocation has been increased arbitrarily.
- It will worsen already difficult traffic issues in Tannery Lane itself and at the junction with the A247.
- It will erode the GREEN BELT in out village even more.
ABIDE BY THE ORIGINAL, AGREED POLICY IN ORDER TO BE LEGALLY COMPLIANT WITH REGARD TO ALL THE LOCAL SUBMISSIONS AND OBJECTIONS PREVIOUSLY SUBMITTED Policy A42 Pages 241-2 is neither sound nor does it comply with the Duty to Co-operate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/2378  **Respondent:** 10892513 / C.R. Sewter  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43 change at Garlick’s Arch because:

- The LOCAL PLAN H1 states "Gypsy, Traveller or Travelling Showpeople accommodation should be provided on development sites of 500 homes or more whilst there remain an identified need" Send has disproportionately been allocated 2 traveller pitches as well as all 8 travelling showpeople plots identified as being needed in the borough until 2034. The developments of over 1500 houses at Gosden Hill and Wisley are only allocated 8 pitches a piece during the same period
- The area floods regularly and is in FLOOD Zone 2.
- All the THOUSANDS of previous objections by local people have been ignored
- There is NO PROVEN DEMAND for Travelling showpeople plots in this location.
- It is beautiful, permanent Green Belt and "no exceptional circumstances” exist.
- This overdevelopment will cause traffic problems on local roads.

Abide by the already agreed Policy A43 pages 144 Land at Garlick’s Arch, Send Marsh. The proposed changes to the agreed Policy are not legally compliant, neither are they sound and not do they comply with the Duty To co-operate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/2379  **Respondent:** 10892513 / C.R. Sewter  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy A58 pages 257-8 at Burnt Common Warehouse, London Road because:

- It was deleted from the 2014 draft because of all the objections made previously.
- The word "minimum" is changed from the previous "maximum" in the 2016 plan and since that time there has been a decline in demand for industrial land.
- There is no need to build industrial or warehouse development in the middle of the GREEN BELT when Slyfield and Guildford still have EMPTY sites and industrial units.
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land FOR THE WHOLE BOROUGH not a massive allocation of 10 HECTURES IN THE GREEN BELT.
- The impact of extra traffic that would be generated would cause gridlock on the local roads.

ABIDE BY THE ALREADY AGREED POLICY A58 DECISION THAT IT SHOULD BE THROW OUT.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3507  Respondent: 10892513 / C.R. Sewter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The housing demand in the Local Plan H1 has dropped by 39 houses per annum from 2018 to 2034. Despite this Send's contribution has been increased with no justification.

The Local Plan H1 Policy states that Gypsy, traveller and Travelling showpeople accommodation should be provided on development sites of 5000 homes or more, whilst there remains an indentified need. "The Send allocation is 2 traveller pitches and 8 showpeople plots. The developments at Gosden Hill and Wisley of over 1500 houses have been allocated just 8 pitches a piece during the same period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/108  Respondent: 10892513 / C.R. Sewter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
There is an overwhelming sense of incredulity and a feeling of getting no co-operation in particular with regard to your re-submission of Policy A43 Land at Garlicks's Arch, Send Marsh/Burnt Common/Ripley, namely his Policy was rejected be around 30,000 - a third of the people from Send. It was apparently throw out. Now it has been not only resubmitted, but amended unrealistically heavily. "Duty to co-operate" does not equate with this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2058  Respondent: 10892641 / S.J. Havell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2647  Respondent: 10892833 / Emily Good  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car a proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
  6. The lack of suitable public The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCl).

- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.
• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) -
where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of
consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPII) planning
application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning
Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also
been raised by a broad number of authoritative sources across the UK, including Highways England, Thames
Water, NATS and the Environment Agency.
• I would point out that the number of new homes has been based on pre-Brexit projections for economic and
population growth, including migration which now needs to be revised downwards, possibly quite seriously.
• Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs
and organic growth. The plan's commitment to build housing across the Guildford countryside will
mean either major infrastructure investment, which no one will believe will happen and for which there are no
funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication
services.
• Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in
absolute terms and disproportionate relative to the rest of the. It will destroy the rural character of these
communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows),
Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3526  Respondent: 10892833 / Emily Good  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A39

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Environmental Impact of Proposed Housing in Horsley: Flood Risk

Building the large numbers of houses proposed in the Draft Local Plan will significantly increase the risk of flooding.
I strongly object to the proposal in the Draft Local Plan for housing development in Area 72, adjacent to Horsley station.
This housing would be located in a floodplain. Housing on this site will adversely affect local drainage patterns, having a
knock-on effect further down the drainage basin. Increase in the volume of run-off due to paving over of arable land,
coupled with higher incidence of flash-flooding caused by Global warming, will result in a greater frequency of abnormal
fluvial discharge, beyond the capacity of the existing drainage system. This will increase the likelihood of homes in the
vicinity being flooded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Impact of Additional Residential Housing and Population Increase on Local Facilities

I strongly disagree with the premise in the Draft Local Plan that Okham and the Horsleys are a suitable location for a large number of additional new houses. The housing numbers proposed for Guildford Borough are for 13040 homes over 15 years from 2016 to 2031. This number is too high. The number is based on a Strategic Housing Market Assessment (SHMA), which the council required to be amended by the Head of Planning. This amendment has not taken place and therefore the number of new builds proposed in the Draft Local Plan has no basis. I object to Guildford Council proposing a Draft Local Plan on the basis of flawed evidence.

As an inhabitant of West Horsley I know at first hand the existing population pressure on local facilities. The primary school in our neighbourhood (The Raleigh) is oversubscribed, in common with the local secondary school, the Howard of Effingham. Indeed, in spite of being a Horsley resident, I was not able to secure a place for my daughter in either school. The local medical centre is also filled to capacity. Residents of adjacent villages e.g., Ripley, East and West Glandon also use the centre. As a consequence, new residents to the village are known to register with alternative practices e.g., Bookham. In conclusion, the village services that currently exist in the Horsleys are already filled to capacity and do not have the facilities to accommodate the large number of new residents which would result from the increase in residential housing proposed in the Local Plan.

Impact of Increased Residential Population on Transport

An increase in the number of residents would result in a heavy increase in both construction related traffic and subsequent traffic arising from an increase in local population.

Most residents of the Horsleys work outside the villages. They either commute into London or Guildford by train, or travel by road to places of work and education. There are very few indigenous employment opportunities in the Horsleys. Essentially they are commuter dormitories. The residents of proposed additional housing are unlikely to be employed in the immediate vicinity of the Horsleys. They will therefore join existing commuters travelling either by road or rail. Horsley station car park is already filled to capacity, and there is no option to extend the car parking facilities for the station. The land is not available for expansion. Likewise, at Effingham Junction, there is little land to spare for additional parking facilities. I would conclude, therefore, there is limited potential for additional commuters to park at the local stations and commute by train. I might add, that Horsley station already serves as a rail hub for adjacent villages (e.g., Shere and Ripley), resulting in heavy road usage at peak commuting time. The housing development proposed in the Local Plan will increase the traffic volume through the village, resulting in additional air and noise pollution.

Key road links to the Horsleys focus on the A246, from Leatherhead to Guildford, and additional rural (narrow and winding) roads linking the villages to Ripley, Cobham and the A3/M25. The A246 currently carries a very high volume of commuter traffic at peak periods creating bottle necks and traffic congestion at both the Givons Grove roundabout on the Leatherhead bypass, and the Merrow roundabout on the outskirts of Guildford. The A3 likewise carries a heavy flow of traffic both into Guildford and north to the M25 at peak hours, with stationary traffic a frequent occurrence. The construction of additional housing in a rural area, which by its location and nature, requires inhabitants to travel predominantly by car, will exacerbate an already congested road network. This will clearly have safety implications, as more congested narrow, rural roads will result in a greater frequency of road traffic accidents and undeniably loss of life. It will also increase traffic congestion in local employment hotspots such as Guildford, and Leatherhead.

It makes much more sense to redevelop brownfield sites in Guildford and Woking to accommodate additional housing needs. This would have the advantage of providing new residents with the option of using the existing public transport network, or walking or cycling to work or school. They would also have a full range of urban facilities on their doorstep.
In conclusion, I strongly object to the new housing proposals outlined in the Draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPP16/7799</th>
<th>Respondent:</th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (

I would like to register objections to Guildford Borough Council Proposed Local Plan (June 2016) and inclusion in the plan of proposed multiple development sites in the Horsleys:

Urbanisation of the Green Belt

I strongly object to removal of the land areas in the vicinity of the Horsleys from the Green Belt. The Green Belt prevents urban sprawl and retains important wildlife corridors in proximity to the highly urbanized areas of outer London. It helps maintain clean air quality and provides recreational areas for urban dwellers from both Greater London and adjacent conurbations.

There are five legal reasons for protection of land assigned as Green Belt:

1. To check the unrestricted sprawl of large built up areas
2. To prevent neighbouring towns merging into one another
3. To assist in safeguarding the countryside from encroachment
4. To preserve the setting and special character of historic towns
5. To assist in urban regeneration by encouraging the recycling of derelict and other urban land

The provision of the Green Belt in the vicinity of the Horsleys meets the criteria listed above. The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. Unmet housing need is not an exceptional circumstance in law. In addition the existence of the Green Belt as an Area of Outstanding Natural Beauty (AONB) is a reason for not meeting objectively assessed housing need (i.e., such protected land is a legal constraint against any such development). The Draft Local Plan has not demonstrated exceptional circumstances requiring additional housing.

Removal of Villages from the Green Belt

I strongly disagree with and object to the assumption made in the Draft Local Plan that it is reasonable to remove villages such as West and East Horsley from the Green Belt. It seems remarkable that a single act of Parliament by the current Government can undo the good work for the provision of the Green Belt and protection of rural England laid out in the Town and Country Planning Act of 1947. The rationale behind the need to protect rural areas in close proximity to ever growing metropolitan areas is more relevant today than ever, in light of the projected growth in UK population.

I object to the method of defining settlement hierarchy as described in the Draft Local Plan. In particular, I take exception to the "classification" of East Horsley as a "Semi-Urban village" and question the basis for this classification. Horsley lacks most of the infrastructure and community facilities taken for granted in an urban area. The key charm and attraction of Horsley is essentially its rural character.
To accrete large numbers of new houses to the Horsley - Okham area would change the character of these ancient villages permanently, resulting in a detrimental impact on the environmental and village character.

In summary, I strongly object to the proposal in the Draft Local Plan to take the following villages out of the Green Belt: East Horsley and West Horsley (North), Effingham, Ripley, Shere and West Horsley (South).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object in the strongest possible terms to the draft plan in its present form and urge you to reject it and herewith are my reasons.

I am 35 years of age and was born in Send where I have lived most of my life apart from a couple of years when I worked and lived in London. Coming back to Send in 2012 was not something I had originally planned but I was delighted to find that, although the local area had absorbed some new housing development, it had nevertheless retained its appeal as a village environment. If the existing local plan were to be implemented, this will be lost for ever more and Send, Send Marsh, Ripley and Burnt Common will become just another sprawling Goldsworth Park, featureless, without character and totally unattractive.

What we need are imaginatively planned areas of residential regeneration for mid high rise development in the centre of Guildford. Conversion of property above current retail buildings would provide much needed residential accommodation and rejuvenate the high street. Come on you planners! Let's have some new, exciting ideas for the younger generation living in the area, not more of the same-old, same-old!

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the land at Garlicks Arch being developed for 400 houses and 7,000 sq metres of commercial premises on this Green Belt site. This is a late addition to the Plan and has not been consulted on. There are no "exceptional circumstances". This scale of development at this location does not have the infrastructure to support it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPS16/2840  Respondent:  10893505 / P J Freeland  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to a new interchange for the A3 at Burnt common which will result in a massive increase in traffic through Send, causing gridlock, noise and emissions pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/6237  Respondent:  10893505 / P J Freeland  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the removal of Send from the Green Belt which was designed specifically to prevent Woking and Guildford becoming one sprawling housing estate. No justification has been given and its removal runs counter to national policy and manifesto commitments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPA16/1028  Respondent:  10893921 / Jim Browne  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing in reference to the proposed changes to the green belt in the Guildford Local Plan.

I strongly object to the building of 400 houses and 7000 sq. metres of industrial space at Garlicks Arch, this area to prone to flooding and is home to ancient woodland, woodlands that helps minimise noise from the A3. The Environment Agency has the area at higher risk of flooding then the council!

I strongly object to the building of 45 houses at Clockbarn Nursery, Tannery Lane does not provide sufficient or safe access to support this development. At places the lane is the width of a car with limited visibility to see other cars and road users coming towards you.

I strongly object to a new interchange with the A3 at Burnt Common, diverting large amounts of traffic from the A3 and M25 through Ripley and Send with the resulting impact of increased air and noise pollution.

I strongly object to not protecting the green belt, I object to removing Send, Ripley and Clandon from the green belt together with the sites at Wisley Airfield and Garlicks Arch and the resulting urban sprawl. There are no exceptional circumstances to remove these sites and villages from the green belt, as required by the national planning policy.

Can my comments please be shown to the planning inspector and can I have confirmation that my letter has been received.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3076  Respondent: 10894305 / Mark Rowden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Whilst I understand that new housing has to be built I am very disappointed with the proposals in the draft local plan as it appears you have taken little notice of the comments you received after the last consultation.

I object to both East and West Horsley being taken out of the green belt. The green belt has served this country well since its inception and your disregard of the green belt is shocking. How can you justify a figure of 65% of new houses in the borough being built on land that is currently in the green belt? If we continue to build on the countryside there will be none left in a few decades. What a legacy to leave for the next generation! Valuable green spaces will be vulnerable to development if your proposal is passed.

I object to the large number houses being proposed for the sites in the Horsley's and on the strategic sites in the neighbourhood eg land at former Wisley airfield, land at Garlick's Arch and Gosden Hill Farm.
Local road network - the network is already struggling to cope and you now propose such a massive increase in housing without seemingly giving the impact of so many houses and the consequent increase in traffic in the area any serious consideration. Therefore you do not appear to know what improvements to the local road infrastructure will be required in order to accommodate such future increase in traffic.

Traffic and parking and transport - as stated in the previous paragraph the impact on local roads will be tremendous. Has any thought been given to the increased parking need which will be created by the proposed quantity of housing? The local station car parks are already full. Commuters face a situation where they have no where to park and the trains being more packed than they are already at peak times.

Schools and Medical facilities - local schools are already at capacity. Has any thought been given to where all these new children will go for their schooling? No extra places are planned in the Horsley's and any new places on the Wisley site will not be available for many years into the project. The same question has to be asked about medical facilities - where are the new home owners going to go to see a doctor or dentist?

Flooding - why has a site (site behind Ockham Road North) been chosen which is partially a level 3 flood risk when it is known what happens after prolonged rain. Generally everyone knows that the drainage system in this area cannot cope - please come and see the local roads after heavy rain.

Pollution - the great increase in traffic volume which will result from the proposed new housing will cause an increase in nitrogen dioxide and particulates in the environment. This is already a serious concern for certain areas in the borough. How can you allow such a situation to get worse?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3095  Respondent: 10894337 / Elizabeth Pearce  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT and am appalled at the Council once more wanting to pass an application that is on GREEN BELT land.

My objections are as follows

I OBJECT to the 40 houses planned west of Winds Ridge & Send Hill & the Traveller Site, for several reasons

I OBJECT as the land is in Green Belt & the proposed inset is not appropriate due to it’s permanent green belt status.

Ironically a planning application right next to this area APP/Y3615/W/16/3144141 Send Hill Farm, Potters Lane has already been declined on the basis that it would cause harm to the openness of the Green Belt, yet here we have the Council wanting to build so many more houses on huge areas of the Green Belt in the area!

I OBJECT as the road is already too narrow to take existing traffic and it has poor vehicular visability on exiting at the Potters Lane junction, increasing housing and therefore traffic in this area, by an estimated 90+ cars will make this situation far worse and dangerous.
I OBJECT as there is no room for long vehicles, particularly in relation to caravans and additional lorries associated with Traveller sites and the access road is not big enough for increased traffic.

I OBJECT as some of this land is also farmed and grazed and there is a nearby nature reserve and any substantial building work will be detrimental to the area.

The schools in the area are already at full capacity & there are no funds or plan to increase the schools for additional pupil numbers.

The Doctors Surgery is already fully stretched & has no capacity for a substantial increase in patient numbers.

I OBJECT also to the housing being sited on land known to have been an unregulated Tip for many years – as identified by Southern County Searches (Sitescope Ltd) report E.2978,SN-HP dated 5/1/2005 - which if disturbed could release seriously toxic materials and give rise to uninsurable liabilities which would seriously impact GBCs budget for clean up costs. This land is still subject to gas monitoring and does not recommend itself to family housing!

It is detrimental to the health of Send residents, as has already happened in Chertsey which has sadly led to illness & death. We do NOT want a repeat of this for the residents of Send.

I believe if GBC go ahead & build on this land, knowing these potential dangers, then that in itself is a very negligent of the council.

Also I OBJECT as the Traveller Accommodation Assessment research, carried out in June/July 2012 by Millfield Services, cannot be so as the Sittingbourne based market research company was dissolved in 2011.

I also OBJECT as there seems to be a conflict of interest with Hilda Brazil who is part of the liason group for the Traveller Community with Surrey CC and who is playing an active part in this Local Plan.

The land outlined for the 2 Traveller Sites is adjacent to private land owned by Linda Brazil.

If the traveller sites are built, this will open up this piece of land for further traveller Sites.

This is a Trojan Horse, pushed forward by an interested party.

I OBJECT to building 400 houses and 7000 of industrial space at Garlicks Arch.

Guildfords Housing Requirements seem to be rather vague and ill defined and very likely over exaggerated.

The Local Plan seems to be without adequate corroborative information as to how the Housing Requirement assessment numbers were reached, nor does it provide the arithmetic to substantiate how such numbers were arrived at.

When this issue was raised by others, they were, according to Council Meeting Minutes advised that such opportunity was long gone....and such questions were out of time. Such tactics are questionable and not transparent.

This inability to provide the public with credible data gives rise to a very strong probability of a successful challenge to the Local Plan as it seems to fails even the most basic "test of transparency" required at law. This failure gives rise to the risk of Appeal involving high court cost which will likely wipe out GBC Legal Dept budget to the detriment of ratepayers.

I also OBJECT to this proposal on the grounds of the impact of the increased traffic on the area. Already the are is gridlocked in the morning & evening rush hour & the new plans will create even more of a cut through to Woking.

The local roads going through Send & Ripley will not be able to cope & there is no room to widen the roadways.

It will add to congestion.

There is also no evidence to show that new Industrial Units are needed, there are already several empty ones in the area!
I also OBJECT due to the environmental impact and pollution to the area. This proposal does not take such an environmental impact into sufficient consideration.

I also OBJECT to the new interchange on the A3 at Burnt Common as this would mean even more traffic through Send with traffic from the proposed 5000+ new houses in the area.

The surrounding roads will not be able to cope. The infrastructure even if put in place first is impractical, as some of the roads are not able to be widened and just by putting in phasing traffic lights, as suggested at the local meeting by members pf the GCC will not be sufficient.

I also OBJECT as with this number of houses, the local hospitals for the area will not be able to cope at all with the increased demand, it will be a really dangerous situation.

I also OBJECT to the Insetting of the green belt land behind Heath Drive, Send Rd & the vicinity of St Bedes Junior School as this will mean that even more future developments will be proposed, causing further strain on the villages infrastructure.

I also OBJECT to removing Send lakes from the SNCI Designation.

At present a dedicated team tend to the lakes & it is an asset dearly loved & used by the villagers, as well as being a magnet for wildlife. This could be put at risk, meaning the lakes are not so well tended & the risk of flooding would be higher.

I am left to believe that this application to build on huge amounts of Greenbelt Land has been put forward solely as a sweetener to the Developers who are donating land to allow for the proposed 4 way junction on the A3.

I am disgusted that the Council are backing these schemes and not taking into account the harmful impact on the surrounding areas & population and the volume of housing is wholly disproportionate.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/1495  **Respondent:** 10894561 / David Smith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

The increase in housing, which has been subject to a very serious challenge from the GRA, is still excessively high and seems in no way to map onto infrastructure proposals. This figure must be looked at in a much more holistic way than appears to be have been done at present.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/2845  **Respondent:** 10894593 / Anthony Stanton-Precious  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send
Re: Objection to Send Village being removed from the Green Belt.

I want to strongly object to Send Village being removed from the Green Belt, the Village of "Send" was always considered to be a permanent non negotiable Green Belt Zone and that should remain and be honoured.

1) I object to the development in Send Hill as this area is a Pumped Sewerage System which already is overloaded and at full capacity, besides the fact the land is totally unsuitable land as it is contaminated with previous landfill.

2) Clockbarn Nursery is unsuitable to develop as its safety route onto the main road will be hazardous; especially opposite a recreation ground with children playing.

3) I object to any development at "Garlick's Arch " as historically its an ancient woodland site; rare these days, and subject to flooding which under current predictions will flood more frequently in the future with obvious consequences.

4) I object also to the changes at the A3 Roadway Burnt Common Interchange as the increase traffic attracted from other local developments would have a direct effect in traffic congestion in and through the village of Send.

We all need to take a sensible view that these proposals need to be stopped forthwith otherwise the consequences will have a life long damaging effect, we want Send Village to stay within the GREEN BELT.

Would you please ensure you acknowledge receipt of this email, thank you.

Thank you for your honest and serious consideration to our objections... we live here and need to look after the future of our village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
result in the borough’s permanent resident population increasing at 4.5 times the rate of population increase during the period 2001 to 2011. This population growth, by definition, is excessive and unsustainable for a gap town with many environmental, physical and infrastructure constraints.

Over 70% of the proposed housing is planned for land currently in the Green Belt. Housing need is not a reason in law for protected green belt land being used. It is perverse for so much housing to be planned for the green belt. Clearly, the green belt has not been used as a constraint as clearly set out in Government advice, planning policy guidance, the NPPF, case law, election manifestos and Ministerial letters to MPs.

For the West Horsley this is reflected in a 35% increase in the number of houses within 3-5 years of a plan being adopted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15500  Respondent: 10894817 / Stephanie Woodford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the expansion of commercial land in the urban area losing the potential for further housing. Policy E7: Guildford Town Centre

There is no reliable evidence provided that the retail core of the Town Centre can support expansion of 45,000 sq m of additional retail space at North Street.

Online retail is set to account for 21.5% of total retail sales by 2018 from 12.7% in 2013, the highest online retail share in the world according to the Centre for Retail Research. March 2016, online sales rose 12.3%, and it was the third consecutive month in which more than 20% of all non-food shopping took place online, (British Retail Consortium and accounting firm KPMG) With such a high retailers will need just 70 high street stores to create a national presence compared to 250 in the mid 2000’s. An expansion on such a scale is negligent when the Council claims to be in such desperate need for housing.

Retail is a declining industry and should not be invested in by the Borough at the expense of housing in the most sustainable urban location, near employment and transport hubs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15497  Respondent: 10894817 / Stephanie Woodford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy II)

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages. There is too much traffic in our villages already and this plan will cause more congestion in West Horsley, East Horsley, Normandy, Ockham, Ripley, Send and Clandon, with no plan to improve that. The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses in such a small area means dangerous and unsustainable traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15503  Respondent: 10894817 / Stephanie Woodford  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

DRAINS, WATER SUPPLY, FLOOD RISK, CONGESTION

Our drains, our water supply, our medical facilities and our roads cannot cope with the proposed number of new homes. Building this number of homes will lead to flood risk here and downstream (along the Wey and Thames). The planned development on Green Belt is therefore unsustainable.

In conclusion, I must ask you to revise the housing number, and to amend the Local Plan to utilise brownfield land rather than green field sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15499  Respondent: 10894817 / Stephanie Woodford  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Under the current economic climate post Brexit, it is unlikely any additional funding will be made available for new capital projects. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15498    Respondent: 10894817 / Stephanie Woodford    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to poor air quality concerns (Policy I3)

The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health. It has been shown that Wisley already has NOX levels above the EU legal limits and by law a school cannot be located in this area as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15496    Respondent: 10894817 / Stephanie Woodford    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to not protecting the Green Belt (Policy P2)

Our Green Belt is precious. It is what protects London from urban sprawl; it preserves air quality; it prevents flooding; it is the city’s playground. It is for us to conserve and protect it. There are 5 legal purposes for Green Belt, and it meets them all:

- To check the unrestricted sprawl of large built up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

This policy is flawed and should have been amended. In the last consultation just six individuals, out of the c. 7,000 of those who took part in the consultation, supported the policy. Another 20 comments of support were from organisations such as: the University of Surrey, local councils (including Guildford), consultants (e.g. Savills) or landowners. But of the 1,371 who commented on the green belt policy 1,332 (97%) were against.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15501  Respondent: 10894817 / Stephanie Woodford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

NO EXCEPTIONAL CIRCUMSTANCES

The local plan proposes nearly 9000 new homes to be built on Green Belt land (compared with ~ 50,000 current homes in Guildford, so approx. equal to 18% of the existing homes in the borough) – a huge proportion. The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. Unmet housing need is NOT an exceptional circumstance in law. No exceptional circumstances have been disclosed. So the Green Belt boundaries should NOT be changed through the plan making process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15495  Respondent: 10894817 / Stephanie Woodford  Agent:
### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially West Horsley, East Horsley, Normandy, Ockham, Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car.

The development should be in urban areas where there is sustainable transport. West Horsley for example will see the number of housing increased by 35% within 3-5 years of the plan being adopted. The number and density of housing is not in keeping with the local area and is therefore against policies within the NPPF.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPP16/15502  **Respondent:** 10894817 / Stephanie Woodford  **Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2**

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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BROWNFIELD AVAILABLE

There is brownfield land available in the town centre which is being earmarked for commercial development rather than for housing. This is enough to meet our real needs for affordable local homes. There are enough vacant commercial sites for business need and we have enough retail capacity already, so urban brownfield/derelict land should be used for housing

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPA16/2849  **Respondent:** 10894881 / Wendy & Grahama Enderby  **Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send**

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**
I object to Send being removed from the Green Belt. As lifelong residents of Send, having grown up here, married here, bought property here and raised our children here who in turn have grown up here, married here, bought property here and raised our grandchildren here, we are utterly dismayed at the proposals outlined in the Local Plan which is destined to destroy our village and community forever.

I object to the building of 45 houses at Clockbarn Nursery. - Tannery Lane is far too small to accommodate the volume of traffic which will be generated by the proposed 64 apartments at the Tannery and the Marina let alone another large development which will then set a precedent for future development off what is essentially a narrow country lane. The junction with Send Road is already extremely hazardous and the extra volume of traffic will make it even more dangerous.

I object to the building of 450 houses and 7000 sq metres of industrial space at Garlicks Arch. The ancient woodland should be protected and a flood site is hardly suitable for housing. The industrial units would be out of place in our village. They would be unwelcome and unnecessary especially with a large brown field site already available at Slyfield. The development would place an unrealistic burden on our already overstretched local amenities. I object to the development of 40 houses and 2 travellers' pitches at Send Hill. The destruction of this beautiful area and devastating impact on wildlife would be a tragedy. The site is surrounded by effectively single track roads unable to sustain any more traffic. I object to a new interchange with the A3 at Burnt Common. Send Road, Portsmouth Road and A3 are gridlocked now during peak times. An interchange would encourage even more traffic from the Woking and surrounding area through Send never mind from the proposed 2000 houses at Wisley Airfield, 2000 houses at Burpham, 1850 at Blackwell Farm and the proposed developments at Garlicks Arch, Tannery Lane and Send Hill, all of which we have already objected to. The scale of proposed developments of some 6400 houses plus commercial space has to be a hugely disproportionate plan for this area. Removing Send from the Green Belt leaves the prospect of other mega developments being approved which is completely unacceptable and receives our strongest objection. In 2014 our MP stressed that the Government is not requiring Guildford Borough Council to reassess it's Green Belt and that Guildford Borough Council alone has made the choice to consider this option. A letter from Nick Boles MP to Sir Paul Beresford MP makes it clear that 'exceptional circumstances are required for any changes to Green Belt boundaries unmet housing need is not such a circumstance'. Why is Guildford Borough Council ignoring this advice?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3288  Respondent: 10894945 / Peter Pearce  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

When this issue was raised by others, they were, according to Council Meeting Minutes advised that ...such opportunity was long gone....and such questions were out of time. Such tactics are questionable and not transparent.

Additionally, I object to the use of out of date forecasts of housing requirements.
This inability to provide the public with credible data gives rise to a very strong probability of a successful challenge to the Local Plan as it seems to fails even the most basic "test of transparency" required at law. This failure gives rise to the risk of Appeal involving high court cost which will likely wipe out GBC Legal Dept budget to the detriment of ratepayers.

I further OBJECT to GBC taking incalculable risks entering into long term commitments and complex contractual financial undertakings with Developers & Builders who are already suffering reduced demand and associated financial uncertainty of demand/ price slump potential with the economic impact of the United Kingdom on leaving the European Union not likely to be fully known for up to 5/10 years.

There is also no evidence to show that new Industrial Units are needed, there are already several empty ones in the area!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6425  Respondent: 10894945 / Peter Pearce  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to building 400 houses and 7000 of industrial space at Garlicks Arch.

Guildfords Housing Requirements seem to be rather vague and ill defined and very likely over exaggerated.

The Local Plan seems to be without adequate corroborative information as to how the Housing Requirement assessment numbers were reached, nor does it provide the arithmetic to substantiate how such numbers were arrived at.

The GBC Scrutiny Committee seem to have failed to properly evaluate the methodology employed, question or challenge the Paper paid for by the GBC to support their own view! Such failings do not seem to have been questioned by GBC Leaders when making their own assessment either by oversight or conveniently to suit their position.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6431  Respondent: 10894945 / Peter Pearce  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I also OBJECT to the new interchange on the A3 at Burnt Common as this would mean even more traffic through Send with traffic from the proposed 2000 new houses at Wisley Airfield, 2000 houses at Gosden Hill, Burpham & Blackwell Farm 1850.

Again the volume of houses is totally disproportionate to perceived needs.

I am left to believe that this application to build on huge amounts of Greenbelt Land has been put forward solely as a sweetener to the Developers who are donating land to allow for the proposed 4 way junction on the A3.

I am disgusted that the Council are backing these schemes and not taking into account the harmful impact on the surrounding areas & population and the volume of housing is wholly disproportionate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the 40 houses planned west of Winds Ridge & Send Hill & the Traveller Site, for several reasons

It is already too narrow to take existing traffic and has poor vehicular visibility on exiting at the Potters Lane offset junction.

There is no room for long vehicles and the access road is not big enough for increased traffic.

The land in question is on the greenbelt & outside the current settlement boundary.

Ironically a planning application right next to this area APP/Y3615/W/16/3144141 Send Hill Farm, Potters Lane has already been declined on the basis that it would cause harm to the openness of the Green Belt, yet here we have the Council wanting to build so many more houses on huge areas of the Green Belt in the area!

Some of this land is also farmed and grazed and any substantial building work will be detrimental to the area.

I further object to the "Trojan" effect of locating two travellers pitches at the Send Hill site. This would give access to, and encourage occupation by unlicensed travellers on Gypsy own land immediately adjoining the proposed site. Siting of pitches in this location has been recommended to GBC via Surrey County Councillor Hilda Brazil who is a relative of this land owner which seems inappropriate and constitutes a Trojan application which will further perpetuate unnecessary and massive difficulties of enforcement for GBC and potential issues for adjoining householders in Send Hill.

I further object to the fact that Travellers requirements in the area have been similarly over assessed and are based on out of date Assessments.

The schools in the area are already at full capacity & there are no funds or plan to increase the schools for additional pupil numbers.

The Doctors Surgery is already fully stretched & has no capacity for a substantial increase in patient numbers.
I OBJECT also to the housing being sited on land known to have been an unregulated Tip for many years which if disturbed could release seriously toxic materials and give rise to uninsurable liabilities which would seriously impact GBCs budget for clean up costs. This land is still subject to gas monitoring and does not recommend itself to family housing!

It is detrimental to the health of Send residents, as has already happened in Chertsey which has sadly led to illness & death. We do NOT want a repeat of this for the residents of Send.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<tr>
<th>Comment ID:</th>
<th>PSLPP16/13471</th>
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I also OBJECT to this proposal on the grounds of the impact of the increased traffic on the area. Already the area is gridlocked in the morning & evening rush hour & the new plans will create even more of a cut through to Woking.

The local roads going through Send & Ripley will not be able to cope & there is no room to widen the roadways.

It will add to congestion.

I also OBJECT due to the environmental impact and pollution to the area. This proposal does not take such an environmental impact into sufficient consideration.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I am writing to object to the above planning application

I OBJECT and am appalled at the Council once more wanting to pass an application that is on GREEN BELT land and failing to adopt sensible and realistic proposals which meet local and national guidelines and priorities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need. If students were housed properly by the university on site this would release approximately 2,000 homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the Green Belt status being removed from Send, Send Marsh, Ripley and the Clandons. The effect will be that we will become part of the urban sprawl of Woking. The Green Belt is meant to be permanent and not continually eroded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I object to building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6377  Respondent: 10895009 / Holly Broughton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I object to the development at Garlick’s Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks’ notice and without any prior consultation and is not required in terms of housing need either for the village or the borough. It was a very late inclusion into the 2016 plan. No prior consultation was held with the residents of Send Marsh. This will increase the village by 25% and is not needed.
• I object that no explanation or planning has been given to the impact on the infrastructure i.e. roads, schools, dentists, doctors, congestion, and pollution.
• I object that the building will be on a site that regularly floods. Will this push the problem further down into the village? I live in Greyfriars Road. If this development causes my house to flood I will sue the Council for any damage incurred plus the devaluation of the property.
• I object to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available and where developers are anxious to create this type of building.
• I object that 4 businesses employing a number of people will be forced off the land against their will.
• I object that ancient woodland dating back to the 16th century will be removed. How can you even contemplate cutting these down!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6379  Respondent: 10895009 / Holly Broughton  Agent:
### Comment ID: PSLPS16/6381  **Respondent:** 10895009 / Holly Broughton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

• I object to the proposal to build a 4 way interchange onto the A3 at Burnt Common in order to facilitate this development and other nearby developments. This would be disastrous for the local area. Commuters would be drawn to this area and further congest an area that is already badly congested with traffic. It will mean that the narrow Send Road (A247) will be gridlocked all day as would most surrounding roads. Send will be the through route to Woking for traffic leaving the M25 at Junction 10, and the new development of 2,000 houses at Wisley and also the new development of 2,000 houses at Burpham.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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### Comment ID: PSLPP16/13342  **Respondent:** 10895009 / Holly Broughton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

• I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• I object to the removal of the attractive open country side which is part of the permanent Green Belt which is protected under the National Planning Policy Framework. It also represents unrestricted sprawl and goes against the purposes of the Green Belt which include the prevention of merging of towns and settlements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13347  Respondent: 10895009 / Holly Broughton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send, Send Marsh and Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13338  Respondent: 10895009 / Holly Broughton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all proposals to build on the Green Belt at Send, Ripley, Send Marsh, Clandon and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs. None of these areas have a decent bus service and therefore new homes will rely upon cars for transport adding to existing congestion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13349  Respondent: 10895009 / Holly Broughton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
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<td>• I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.</td>
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<th>Comment ID: PSLPA16/1657</th>
<th>Respondent: 10895137 / Katrina Broughton</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>• I object to all the proposed sites in Send and Send Marsh because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send and Send Marsh have not been properly consulted and all its sites have been changed substantially</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>• I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need. If students were housed properly by the university on site this would release approximately 2,000 homes</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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I object to building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the development at Garlick’s Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks’ notice and without any prior consultation and is not required in terms of housing need either for the village or the borough. It was a very late inclusion into the 2016 plan. No prior consultation was held with the residents of Send Marsh. This will increase the village by 25% and is not needed.

I object that no explanation or planning has been given to the impact on the infrastructure i.e.roads, schools, dentists, doctors, congestion, and pollution.

I object that the building will be on a site that regularly floods. Will this push the problem further down into the village? I live in Greyfriars Road. If this development causes my house to flood I will sue the Council for any damage incurred plus the devaluation of the property.

I object to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space.
from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available and where developers are anxious to create this type of building.

I object that 4 businesses employing a number of people will be forced off the land against their will.

I object that ancient woodland dating back to the 16th century will be removed. How can you even contemplate cutting these down!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3185  Respondent: 10895137 / Katrina Broughton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to build a 4 way interchange onto the A3 at Burnt Common in order to facilitate this development and other nearby developments. This would be disastrous for the local area. Commuters would be drawn to this area and further congest an area that is already badly congested with traffic. It will mean that the narrow Send Road (A247) will be gridlocked all day as would most surrounding roads. Send will be the through route to Woking for traffic leaving the M25 at Junction 10, and the new development of 2,000 houses at Wisley and also the new development of 2,000 houses at Burpham

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3187  Respondent: 10895137 / Katrina Broughton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/6955  Respondent: 10895137 / Katrina Broughton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6954  Respondent: 10895137 / Katrina Broughton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Green Belt status being removed from Send, Send Marsh, Ripley and the Clandons. The effect will be that we will become part of the urban sprawl of Woking. The Green Belt is meant to be permanent and not continually eroded

I object to the removal of the attractive open countryside which is part of the permanent Green Belt which is protected under the National Planning Policy Framework. It also represents unrestricted sprawl and goes against the purposes of the Green Belt which include the prevention of merging of towns and settlements

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6953  Respondent: 10895137 / Katrina Broughton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all proposals to build on the Green Belt at Send, Ripley, Send Marsh, Clandon and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs. None of these areas have a decent bus service and therefore new homes will rely upon cars for transport adding to existing congestion.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1061 Respondent: 10895137 / Katrina Broughton Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all the proposed sites in Send and Send Marsh because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send and Send Marsh have not been properly consulted and all its sites have been changed substantially.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1062 Respondent: 10895137 / Katrina Broughton Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I request a confirmation by email from GBC that all of the objections made above are put to the Inspector appointed by the Secretary of State to review the GBC Regulation 19 draft local plan.

I request that once my objections are fully taken into consideration the draft plan is amended accordingly and re-issued.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3997  Respondent: 10895233 / Val and Geoff Glassup  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to submit my response to the GBC Local Plan 2016.

I have lived in our house in Glaziers lane Normandy since May 1970 and have very much enjoyed the surroundings here and now have many friends with neighbours and their families here.

I am now very concerned that everything will now change when 1,100 houses are built in Normandy and Flexford causing much more traffic, and noise. Glaziers lane is already a dangerous racing track despite the 30 mile pm notices which are very much ignored.

The current surroundings are beautiful and very enjoyable, the green countryside should not be spoilt. Please don't let that happen.

To be clear I strongly object to the proposals to develop the land shown as Site A46 in the draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4081  Respondent: 10895233 / Val and Geoff Glassup  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I strongly object to the release of Site A46 from the Green Belt. I base my objection on the following :-

1. I consider that the Borough is already overcrowded and that the massive development proposals in the whole of the Plan will greatly detract from the future enjoyment of living in the Borough.

1. I object in general to the release of large areas for development, particularly away from the main urban area of Guildford, because of the huge undesirable change in the character of those areas it will cause, and the difficulty of integrating so many new people in a short time.

1. I object to new large areas for development being proposed which have little or no

1. I object in particular to the massive development proposed in site A46 (Normandy/Flexford) and A29 (Ash/Tongham) because these areas are already overcrowded in terms of movement, especially in the centres of Glaziers Lane, Normandy, Ash Street, and Ash Wharf.

1. I object to, what will in effect be, the creation of two villages with two centres if the massive proposals for A46 go ahead.

Regarding the overcrowding of the Borough as a whole, it is plain to see that in terms of travel we have reached a point where during the extended peak times there is undesirable congestion at a huge number of locations. In many of these there is little that can be done in the short or medium term to alleviate this. Major schemes such as the A3 improvement through Guildford will take decades to come to fruition and yet they are needed now even without the massive new development proposed across the Borough.

Regarding the release of large areas, I think it is unreasonable to impose such significant and dramatic changes on local people in rural areas which would take place over such a short time. Established communities have a character of their own and in my view it is unreasonable to impose change that would make the locality unrecognisable.

Regarding the history of development proposals I think it is unreasonable to suddenly come up with a proposal to virtually double the size of a village such as Normandy where development of this magnitude has really never been contemplated before. At least those people living in the vicinity of areas such as Wisley Airfield and Gosden Hill Farm have been aware of the likelihood of such massive change for decades. Uncertainty about the future has been taken on board by people living there for a long time. This is not the case in respect of sites A46 and A29. These would create undesirable uncertainty for the majority of people living there.

Regarding the specific sites A46 and A29 it is my view that the imposition of such a massive amount of new development will have a serious detrimental effect on those areas. The roads in Normandy, Guildford Road/Glaziers Lane/Westwood Lane, are very heavily used not only by private cars but also goods and heavy goods vehicles. The road system is unsuitable for any further increase of traffic. The railway bridge at Wanborough Station is narrow and has an awkward skew. I see little chance of this being improved during the life of the Plan. The railway bridge in Westwood Lane is narrow, low and skewed and cannot be used by heavy good vehicles, putting and unreasonable strain on alternative routes such as Glaziers Lane. Again, I see little chance of improvement there in the life of the Plan.

The roads in Ash Street and Ash Wharf are already heavily overcrowded and the imposition of much increased traffic there seems to me to be totally unreasonable and very plain to see.

Regarding the creation of two villages, if the massive development of A46 goes ahead there will inevitably be, one would hope, shops and community facilities included in the proposals. This will, in my view, detract from the on-going success of the current village centre which is developing around the new village hall and the Manor Fruit Farm site. I accept that some form of development in Normandy will be inevitable, but I feel strongly that this should be by way of a limited number of small in-fill sites which would come on in a gradual manner so that new families can be absorbed into the existing character of the village.

In conclusion, to be clear, my personal main objection to the Plan would be the release of Site A46.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to Send Village being removed from the Green Belt
As I understand the Green Belt was always intended to be kept as such to provide a division between Villages, towns etc.
I object to the building of 45 houses at Clockbarn Nursery.
Tannery Lane has as exceptionally narrow and winding road, in places only room for one car and if you meet a lorry there is no room for maneuver.
Also a very hazardous junction coming from Tannery lane to join the Send Road, the sight vision is dreadful with parked cars either side of the junction onto the main road.
I object to the building of 400 houses and an Industrial space at Garlick’s
This site in particular is covered with woodland and pasture and certainly never intended for building purposes.
The site floods dreadfully, water coming off the A 3 into the stream which then floods the fields.
We have photographic proof of this as it is Cobham Sporting Gun Club site and has been for the best part of 30 years and floods often.
The Industrial proposal should be sited at Slyfield which would be ideal to extend and keep in one place.
I object to the development of 40 houses and 2 pitches on Send Hill called the Paddocks
Again access to this site is very narrow especially from the Cemetery down to Potters Lane where that junction is often a cause for concern the way the traffic speeds along Potters Lane and again an inappropriate place for houses and travelers site.
I object to a new interchange with the A3 at Burnt Common very strongly.
The traffic now if there is a problem on the M25 or A3 is horrendous through the villages of Ripley, Send Marsh and Send and we become grid locked with traffic finding alternative routes out of the congestion.
The roads are not capable of taking on all the extra volume of large lorries which is what would happen.
We had to have an Air Ambulance land on Send Marsh Green last week for an accident and part of our road was closed diverting bus and large vehicles around the Green causing havoc, we cannot support all this extra traffic, its spoiling our lovely English Villages here in Surrey.

Lets not ruin our lovely countryside when there are a lot of Brown Sites to consider first ...WE DONT WANT TO BE JOINED TO GUILDFORD, WOKING etc.

What consideration has been taken for Drs, Schools, Colleges, Transport Leisure etc.?

All these things require a car, bus, train, coach which again add to the volume of traffic at rush hours

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:  PSLPP16/7107  Respondent:  10896065 / Georgia Bean  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Disproportioned number of new houses for local facilities: I strongly object to the number of new houses proposed within the Horsleys and surrounding villages namely Ripley, Send and Clandon. Within the Horsleys, the schools, doctors and train stations are struggling to cope with the current demand. My family commute to London from Horsley and the trains and car parking are almost at maximum capacity. Assuming that every new house has at least two cars, this means potentially 6000 more cars within a three mile radius of the villages. The impact on the local roads will be tremendous. Parking at Horsley & Effingham junction stations (which are already full), at the shops, at the medical centre and at the village hall will be affected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/7108  Respondent:  10896065 / Georgia Bean  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Pollution: I strongly object to the new draft plan proposing additional 2000 homes at Wisley, 2000 at Gosden Hill Farm, nearly 600 in The Horsleys and 400 at Garlicks Arch as it will have a great impact on the local road network which at peak times is already struggling. The large increase in volume of traffic will cause an increase in nitrogen dioxide and particulates in the environment - already a cause for concern in several areas in the borough. Additional noise and air pollution will be inevitable with this increase in traffic and it will have a significant impact on our environment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7111  Respondent: 10896065 / Georgia Bean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I sincerely hope you, the council, will consider my objections and avoid destroying the Borough’s Green Belt which is precious and I fear for its demise. Our British countryside needs to be protected for future generations of population, animal, bird and plant life. Please protect our environment from increased pollution and flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7106  Respondent: 10896065 / Georgia Bean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to advise of my objections to the new Guildford Borough local Development plan recently published.

Loss of Green Belt Land: I strongly object to the expansion of the Horsley village boundaries and its subsequent removal including Ripley, Send and Clandon from the Green Belt. The new mayor of London has instructed London planners NOT to approve development on Green Belt Land within the M25. If we continue to build on our countryside it won’t be too long before we have none left. There is insufficient details and/or evidence within the local plan to support why this action is necessary and therefore I strongly object. Our British countryside needs to be preserved along with our wonderful animal, bird and plant life which will be inevitably affected by the erosion of the Green Belt Land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/7109  Respondent: 10896065 / Georgia Bean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Flooding: I strongly object to the new draft plan in respect of flooding. The site behind Ockham Road North in East Horsley is partially a level 3 flood risk area and as local residents we are well aware of how much standing water there is in our gardens after rainfall. In fact, my dad's car was “written off” due to water damage at the A3 roundabout at Ripley in 2013 due to flooding. Building on such land will only exacerbate the problem. Our drains can’t cope now causing chaos on our local roads during heavy rainfall.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7110  Respondent: 10896065 / Georgia Bean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposed development plan is disproportionate to the size of the villages and is an over kill. It is directly out of proportion to the size and availability of brown field sites already available for development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1736  Respondent: 10896321 / Christine Dunstan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s draft Local Plan Proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Far, which will:

• Destroy views from the Hog’s Back ridge0 a nationally designated Area of Outstanding Natural Beauty
• Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
• Increase tailbacks on the A31 and traffic congestion
• Result in rat-running through local roads
• Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/924  Respondent: 10896513 / Brian Holt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing as a committe member of Guildford City Football Club. Would you please explain why after already being passed at the first local Draft Plan planning committe meeting, Policy number 68, the community football ground on land at Gunners Farm and Bullens Farm, has now beem withdrawn at the second Draft Local Plan Committe meeting. Councillors have explain, if you ask the reason why it has not been withdrawn? a explanation has to be given.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1808  Respondent: 10896801 / Clare Fluker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have given the proposed Local Plan a great deal of consideration and I strongly object to the Local Plan as presently drafted on the following grounds:

The proposed housing numbers have no basis in the real world and seem to have just been plucked at random out of thin air. This completely undermines the basis of the whole Plan and makes it an entirely invalid exercise. Until this is rectified the whole Plan is worthless.
The final major flaw in the Local Plan is of course that it was created on the basis that we were in the EU and whilst I voted to stay we are now in a post Brexit world and everything is likely to change. The Local Plan must clearly now be revised to reflect the fundamental changes that will result from this exit from the EU.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1809  Respondent: 10896801 / Clare Fluker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

With regard to the proposed development of the former Wisley Airfield as I have stated before this appears to be being treated by Guildford Borough Council as though it was the development of a brownfield site. It is not. The clue is in the name, Airfield. It is or at least should be a field in the Green Belt if the agreement with the original owners to remove the runway when it closed had been enforced as it properly should have been. This is therefore just a proposal to build on a large area of the Green Belt with no exceptional circumstances involved and should be rejected on that basis. Notwithstanding that it is a completely inappropriate development of the land concerned both as to scale and nature and would put completely unacceptable pressure on local facilities e.g. roads, sewage, water etc

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3549  Respondent: 10896801 / Clare Fluker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Comment ID: PSLPP16/7825  Respondent: 10896801 / Clare Fluker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

To suggest that the central small shopping area in East Horsley is a "District Centre" is just ridiculous. Perhaps whoever wrote this part of the Local Plan should try visiting the area and should also check the definition of a "District Centre" before making such a suggestion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 10896801 / Clare Fluker</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Dealing with some of the detail of the current Local Plan my further objections are as follows:

Local infrastructure in both the Horsleys is already at or over capacity e.g. schools, surgeries, dentists, water, sewage, drainage, roads etc

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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The proposal to remove villages including the Horsleys from the Green Belt makes a mockery of the whole concept of the Green Belt and just seems to be a rather cynical attempt to permit more development within the village boundaries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
| Comment ID: PSLPP16/7824 | Respondent: 10896801 / Clare Fluker | Agent: |
| Comment ID: PSLPS16/2821 | Respondent: 10896833 / Margaret Morgan | Agent: |
| Comment ID: PSLPP16/6226 | Respondent: 10896833 / Margaret Morgan | Agent: |

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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**Comment ID:** PSLPP16/7824  **Respondent:** 10896801 / Clare Fluker  **Agent:**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

With regard to the proposed extension of those boundaries there appears to be no logic to them and they seem solely to be aimed at increasing the area within the village boundaries (see above) available for development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/2821  **Respondent:** 10896833 / Margaret Morgan  **Agent:**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/6226  **Respondent:** 10896833 / Margaret Morgan  **Agent:**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford.

I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because this is a precious open space to be kept as a legacy for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1001  Respondent: 10896833 / Margaret Morgan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1777  Respondent: 10897057 / Heather V Jeffery  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to strongly object to the final draft local plan and my reasons are as follows.

There is little reliable evidence or justification for such a massive development in Send's Green Belt. The scale of the development proposed for Send and Ripley is excessive, unnecessary and destructive to our community and Green Belt. There is no justification for the additional houses nor the proposed industrial development of 7,000 sq.m. at Garlick's Arch. Even with the proposed interchange on to the A3 at Burnt Common the whole area will be gridlocked. At the present time any problem at the M25/A3 interchange Send and Ripley becomes gridlocked. The whole Plan is a disaster waiting to happen. It goes against the principles of community planning and is no more than a green light to developers, backed by Guildford Borough Council, to carve up rural Surrey.
The well established policies of the Green Belt is to protect open spaces, prevent encroachment into the countryside and stopping linear development leading to the joining together of developed communities have been ignored in the proposals for Send. This plan will produce a huge overload on local and main roads.

Additional points I wish to add are as follows:

There is no requirement for the scale of development proposed. Surrey already has the largest population per square mile in the UK and should not increase.

This plan does not take flooding into account and we all know that this is a problem for the area and residents in particular.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/481  Respondent: 10897217 / Warren Hogben  Agent:

Comment: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan's proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/670  Respondent: 10897217 / Warren Hogben  Agent:

Comment: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 547 of 2167
6. I object to the inclusion of the land at Garlick's Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for its removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance.

The Plan states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt Common replaced it with Garlick's Arch.

The site is not appropriate because:

- There is no sustainable transport
- The site is liable to frequent flooding
- The site has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.
- There are no plans to improve local schools, medical or utilities to cope.

7. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy 03)

The Garlick's Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

9. I object to the Borough Wide Strategy (Policy S2)

GBC's proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there's too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan's new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

10. I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick's Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

12. I object to the employment strategy and impact at Garlick's Arch (A43) (Policies E2 and E5)

There is no need for new industrial sites at Garlick's Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed.

That site was removed from the Plan without any reasoning.

Furthermore the development at Garlick's Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

13. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25), should not take place.

14. I object to the lack of proper infrastructure planning for sites (Policy I1)
The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick's Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough

I wish these objections to be fully taken into consideration and that the plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/669  Respondent: 10897217 / Warren Hogben  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

North facing ramps to the A3 at Burnt Common would be a disaster for local communities, which do need to access the A3 to the north, but the addition will draw in a huge amount of 'through' traffic. E.g. all traffic from London/M25 to Waking would go through Burnt Common, Send and Old Waking. This is not sustainable as this cannot be improved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1326  Respondent: 10897217 / Warren Hogben  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy 11)

There is way too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that.
The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses means dangerous and unsustainable traffic.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/1327  **Respondent:** 10897217 / Warren Hogben  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

11. I object to poor air quality concerns (Policy 13)

The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/1324  **Respondent:** 10897217 / Warren Hogben  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick's Arch (A43).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/1325  **Respondent:** 10897217 / Warren Hogben  **Agent:**
2. **I object to development in areas which are at risk of flooding (Policy P4)**

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick's Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council's own assessment. This area has flooded many times in recent years and therefore the Council's assessment is not good enough to be included in the plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of Send and surrounding villages from the Green Belt which separates them from Guildford and Woking. One of the reasons for the formation of the Green Belt was to provide a 'lung' for London; now, with the increasing concern regarding the poor air quality and pollution in London, it is counterproductive to remove areas from the Green Belt and build on them, thus creating more pollution.

I object to the building of 400 houses and 7000 sq metres of industrial development at Garlick's Arch opposite the junction of Send Marsh Road and Portsmouth Road. This construction will create a great deal of additional traffic on the A247, and the local infrastructure will not support it. Traffic will be greatly increased in Send Marsh Road, which is a winding residential road. There has been no consultation on this proposal.

I object to the proposed new interchange onto the A3 at Burnt Common. The J247 will be used as a cut through from Woking to the A3 and M25, by heavy commercial vehicles as well as cars, and at Send is mainly a residential road. There has been no consultation on this proposal.

I object to the building of 45 houses at Clockbarn. The junction of Tannery Lane with Send Road is already dangerous and these extra houses, together with the 64 houses and Marina at the Tannery will bring Send to a standstill.

There have been repeated election promises to protect and preserve the Green Belt. These are not being honoured by Guildford Borough Council, which seems determined to destroy the amenities of a country area and, in doing so, its political credibility.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2509  Respondent: 10897633 / A Aldridge  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Clockbarn Nursery, Tannery Lane - Policy A42 I object to Policy A42 change which increases the number of homes to 60 from 45 for the following reasons:-

Traffic problems at the junction with the A247 (Send Road) will be made even more difficult.

Tannery Lane is a narrow country road with poor visibility and in many places is single track with few passing places.

Any increase in population in Send will cause additional strain on services, especially medical.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Land at Garlicks Arch, Send Marsh - Policy A43 I object to the proposal for 400 homes and 6 travelling showpeople plots for the following reasons:-

The excessive increase in traffic generated will cause frequent blockages of local roads.

The huge increase in population will overwhelm medical and other services. At the present time there is often a 10 day wait for an appointment to see a doctor at the local surgery.

It will join up Ripley and Send and defeat the purpose of the Green Belt, causing even more pollution than exists at present with its proximity to the A3 dual carriageway.

There are no exceptional circumstances to remove this land's Green Belt designation

There is no proven need for travelling showpeople plots in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Land at Burnt Common, London Road - Policy A58 I object to this proposal for a new allocation of a minimum of 7000 sq m of industrial or warehousing for the following reasons:

There is no demand for additional industrial and warehouse development in here are still vacant units at Slyfield and Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2546  Respondent: 10897633 / A Aldridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Burnt Common, London Road - Policy A58 I object to this proposal for a new allocation of a minimum of 7000 sq m of industrial or warehousing for the following reasons: There is no demand for additional industrial and warehouse development in the middle of the Green Belt when there are still vacant units at Slyfield and Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/948  Respondent: 10897633 / A Aldridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The recent Employment Land Need Assessment shows a reduction in demand of 3.9 hectares for industrial land for the whole borough, so the allocation of 10 hectares at Send, in the Green Belt, is not required in the countryside.

The word 'maximum' in the 2016 plan has been changed to 'minimum', which could permit unlimited industrial development in the Green Belt.

Industrial development in this area will create a great deal of additional car and heavy vehicle traffic and cause frequent gridlocks on the local roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID:</th>
<th>pslp171/949</th>
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Green Belt Policy 2 at paragraph 4.3.15

I object to the proposal to inset Send Business Park, Tannery Lane, from the Green Belt for the following reasons:-

It is adjacent to the Wey Navigation and would appreciably reduce the enjoyment of walkers and boat users along the river.

Tannery Lane is a narrow country road with poor visibility, restricted access at both ends and in many places is a single track with few passing places.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
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I also object to GBC ignoring the NPPF regarding the Green Belt and for vastly exaggerating housing numbers from the SHMA 2015 and for not providing sound evidence for the ELNA 2015. The GBC Local Plan is not fit for purpose, as already stated by Sir Paul Beresford MP. Evidence Base

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
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I object to land in Send being removed from the Green Belt. This is my first and foremost objection. GBC Councillors were elected on the back of promises they made to protect the Green Belt and they should not now renege on their election promises.

It is government policy to protect the Green Belt and there are no proven exceptional circumstances in Send which allow it to be used for housing, industrial warehousing or slip road construction to and from the A3. Housing numbers destined for Send are grossly exaggerated and not proven. Brownfield sites could be found for new housing and for industrial use and road building.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPS16/3818</th>
<th>Respondent: 10897665 / Sue French</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A42</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A42 Clock Barn Nursery, Tannery Lane where 45 houses are proposed. Permission has already been granted for 63 apartments at the Tannery site and the 45 proposed at Clock Barn would bring so much additional traffic on Tannery Lane which, as a narrow and winding lane with restricted width in many places, is simply not fit for this increased burden. The junction with Send Road and Tannery Lane is already dangerous enough without extra traffic. This is agricultural land and is also the habitat of bats and flooding is also a concern. It should not be included in the Local Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A43 and A43a Land at Garlick's Arch where 400 new houses have been proposed as well as industrial buildings and slip roads to and from the A3. This site is new and has been added to the Local Plan at the very last minute and was not included in the Regulation 18 draft. This land is ancient woodland and should be preserved. These houses and the proposed industrial buildings would link up the villages of Ripley and Send and generate a huge amount of traffic on roads which are already heavily congested. The A247 through Send is at a standstill during the morning and evening rush hours and there is a bottleneck at Old Woking onto roads which cannot be widened or improved. Other traffic going
through Ripley or Clandon would also be on roads which are narrow and already congested. Councillors must know that the A3 is also often at a standstill during peak hours so why would they want to force more traffic onto these roads?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3817  
Respondent: 10897665 / Sue French  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A44 Land West of Winds Ridge and Send Hill designated for 40 houses and 2 Travellers Pitches. It is a new site, inserted in the plan at the last minute and not previously consulted on under Regulation 18. Again Send Hill is a narrow road which cannot take more traffic. It is on Green Belt land which should not be regarded as suitable for building.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8110  
Respondent: 10897665 / Sue French  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to GBC trying to foist on Send increased noise and pollution from vastly increased traffic. I also object to GBC making no provision for new doctors' surgeries, no shops or a proper post office, no new schools and no improved bus services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/4234  
Respondent: 10897729 / David Hughes  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I currently live in Ripley, but also have previously lived in Send, so know both villages well.

I am extremely concerned, in particular about the proposals to significantly change the Green Belt boundaries around both Send & Ripley.

Whilst, acknowledging some relatively minor changes to the Green belt may be deemed necessary, the current proposals are excessive & in my opinion totally unjustified.

The purpose of redrawing the Green Belt boundaries is presumably to allow further development. However, the changes including the proposed “inset” will potentially lead to a very significant increase in development in the future.

This is totally inappropriate for both Send & Ripley village areas.

My comments on such a proposed Draft Local Plan include the following:-

• The existing infrastructure could not cope with the additional pressures from such proposed extensive developments. For example, the existing traffic on the roads through both Send & Ripley & the congestion at peak periods is already significant.
• The roads are already fairly narrow & increase in traffic flow will cause all sorts of problems, including increased danger to pedestrians & cyclists.
• One long-standing concern for both residents of Send & Ripley is the traffic through the villages that seeks to connect to/from the A3/M25. This has been a potential issue for many years. The proposal to significantly add further local development as proposed will only dramatically increase the traffic flow & this would be intolerable & unacceptable.

There appears to be no significant infrastructure Improvements proposed that would be required to mitigate against such an increase in local development.

• In addition to the traffic problem, there are many other issues relating to infrastructure that would be of concern. These include the increased risk of flooding, lack of places in local schools, pressure on local medical facilities & health care etc. In addition, pressure on parking, particularly near local shops or schools is already a major issue of concern, additional development will only make the situation far worse.
• There seems to be a lack of credible, independent & valid evidence to support the proposals in the local plan. It would appear that there is little evidence to support the need for such large increase just in our immediate area.
• The proposals put a disproportionate amount of proposed new development in our area of the Borough.
• The proposed changes to the Green Belt, as outlined in the draft Local Plan will significant harm & be of detriment to the local areas. It will allow significant development, which the Green Belt was designed to generally prevent. It should be remembered that the Green Belt was designed to prevent urban sprawl by keeping land between settlements of villages open & undeveloped & to prevent linear development leading to the joining together of adjacent communities.
• Under Green Belt policy, there is a general presumption against development unless in exceptional circumstances. Guildford Borough Council do not appear from the evidence provided, to have demonstrated any exceptional circumstances that would justify the significant potential development that is proposed on current Green Belt Land.
• Surrey is apparently the most densely populated County in England, yet the Draft local plan is expected to accept a disproportionate amount of development, compared to other parts of the country. This point must be acknowledged.
• The loss of existing significant Green Belt open areas will be detrimental & spoil the existing countryside, which is one of the reasons why many residents decided to live here in the first place.
• Overall, the proposals will have a negative & harmful impact on both Send & Ripley villages.
• I also understand that only a very limited time has been given with regards to consultation and that some sites have been included at the last minute. This would seem particularly unfair to the residents of the Borough.

In conclusion, I object to the significant proposed changes to the Green Belt particularly in both Send & Ripley areas. The two villages are adjacent & significant development proposal in one will affect the other, as they have common interest & concerns & share facilities such as medical, schools and also some roads/traffic. This proposal is excessive to the extreme and I wish to register that I feel the revised Local Plan is still unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPA16/3575  **Respondent:** 10897953 / Janice Hughes  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

*Answer (if comment is on questions 1-7 of the questionnaire): (*)

**LOCAL HOUSING NEED**

There does not seem to be any substantial evidence within the local plan for the alleged housing need in our immediate area. Whilst some increase may be justified, I object to the assumption that the area close to where we live is appropriate and that there is a clear and urgent demand for the scale of development that is proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/6877  **Respondent:** 10897953 / Janice Hughes  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

*Answer (if comment is on questions 1-7 of the questionnaire): (*)

**PROPOSED WISLEY DEVELOPMENT**

It is noted that GBC previously rejected the proposals . I too also objected to what was proposed at the time. One of the main concerns I had was the access & the assumption that the existing country lanes & roads could cope with the amount of traffic generated by the new development. Clearly they could not and this was a major flaw in the proposal.
However, I personally feel that if an adequate primary access could be designed directly off the A3, which would need access to both North & South bound A3 carriage ways, then this may assist. It is appreciate that this would involve a significant civil engineering project and significant cost, but that would need to be borne by the proposed developers of the site. If it could be established that there was clear evidence of a local need for housing in that location, then such additional costs can be taken to account by the Developers. Obviously there would be other planning considerations to also take into account. One potential advantage of a Development at Wisely would presumably be that the necessary infrastructure could be planned for and form part of the development proposals. For example, a school, doctors surgery and perhaps even some local shops could be included and allowed for. This would help reduce the impact on the surrounding areas and also reduce traffic movement. In terms of potential impact on surrounding areas, a housing development at Wisely might be more desirable than trying to expand existing villages like Send or Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14975  Respondent: 10897953 / Janice Hughes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

LOCAL INFRASTRUCTURE

It would appear that little consideration has been given to such a potentially high level of new development with respect to the impact on local schools, roads, local medical facilities etc. All such services are already stretched. A significant proportion of our local village roads are fairly narrow and traffic builds up regularly. There are problems with the limited choice of local schools and getting an appointment with the doctor at a local clinic is not always easy. So just on this aspect alone, I object to the extent of the potential development in our immediate area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14971  Respondent: 10897953 / Janice Hughes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
GREEN BELT GENERALLY

I am concerned by the extent of the proposed erosion of the Green Belt and object to the current proposals. I understood that one of the purposes of the Green Belt is to maintain adequate separation between villages and settlements etc. and to prevent a sprawl of development over time that effectively joins such areas together, with little or no separation. When examining the proposed local plan, the conclusion is that the proposed erosion of the green belt, particularly along the A3 corridor, between the M25 and Guildford would result in an unacceptable situation. The character of Send & Ripley would be lost and the proposed development at Gosden Hill would almost merge with the proposed expanded areas of Send/ Ripley Villages. For this reason, I strongly object to the current proposals.

IN-SETTING

I object to the extent of the proposed in-setting where significant areas to Send, Clandon/Burpham and Ripley are to be removed from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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DISPROPORTIONATE DEVELOPMENT

There would seem to be a disproportionate amount of development proposed in our area of the Borough. The proposals seem to concentrate on a relatively small area & will have a very significant impact on the villages of Send & Ripley in particular. I object to this disproportionate concentration of development in our local area.

LIMITED CONSULTATION PERIOD

I understand that there has been a very limited consultation period and that new sites were only added to the proposed revised Draft local Plan at the last minute. This would seem unfair and I object to residents being treated this way.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**DEVELOPMENT GENERALLY**

I am not totally against new development. However the amount of proposed development to our local area is inappropriate and I do not believe it is justified. I object to the removal of such significant areas from the Green Belt. If the proposal were scaled down, then I would be more likely not to object so strongly.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<table>
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<tr>
<th>Comment ID: PSLPS16/6004</th>
<th>Respondent: 10898113 / V A Lewis</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</tbody>
</table>

I object to the underhand way in which GBC pushed through the Garlick’s Arch proposal for an additional 400 houses, warehousing, and 7,000 sq.m of industrial space. It was a matter of hours between the proposal in the morning on 24th May and being pushed through to the council meeting and into the draft plan the same day, with no time for consultation or transport assessment. This requires full consultation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<table>
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<th>Comment ID: PSLPS16/6005</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
</tbody>
</table>
I object to the plan for 400 houses and 7,000 sq.m. of industrial and warehousing space at Garlick’s Arch. There is no need for any more houses on top of the 13,860 already proposed for the borough. I object that the industrial and warehousing site has been moved from Slyfield where it had been on a previous plan. Slyfield is where it should be and not in a residential area and it is questionable as to whether it is needed at all.

I object that ancient woodland at Garlick’s Arch will be endangered, some trees dating to the 16th century.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/6006 **Respondent:** 10898113 / V A Lewis **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to an interchange at the Garlick’s Arch site. It would lead to a vast amount of traffic gridlocking local roads which are 2-lane and some single track with passing places, some narrow and twisting.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/6007 **Respondent:** 10898113 / V A Lewis **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the proposal for 40 houses and two traveller pitches (policy A44) – a site prone to flooding and containing documented unsafe landfill waste – with insufficient access via a narrow single track.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp172/2851 **Respondent:** 10898113 / V A Lewis **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A42
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A42 change at C lockbam in Tannery Lane because -
The increase to 60 homes in place of 45 is 33% more
It ignores all the previous objections made by local people
It will worsen access and traffic problems in Tannery Lane and at the A247 junction

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2852  Respondent: 10898113 / V A Lewis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43 change at Garlick's Arch because -
It ignores all the thousands of previous objections made by local people, there is no proven demand for Travelling showpeople plots in this location, the local plan HI policy states "Gypsy, Traveller or Travelling Showpeople accommodation should be provided on 500 HOMES OR MORE, Send has been disproportionately allocated 2 traveller pitches and 6 travelling showpeople plots whereas the developements of over 1500 houses at Gosden hill and Wisley are only allocated 8 pitches each. Surely anyway residential developments are not suitable to this use.
- It is green belt and no 'exceptional circumstances exist
- It is overdevelopment of our village
- It is beautiful ancient woodland
- It will would lead to a large increase in traffic gridlocking local roads which are
  - lane and some single track
- It is contaminated by lead shot

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2854  Respondent: 10898113 / V A Lewis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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</table>

I object to Policy A58 at Burnt Common because -
- It was deleted from the 2014 draft because of all the previous objections
- It is a residential area and not suitable for industrial development. There are empty sites and industrial units in Guildford and Slyfield. Slyfield is where it should be sited and not in green belt
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green belt
- The roads in this area are unsuitable for the traffic this development will generate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPS16/6002</th>
<th>Respondent: 10898145 / Louise French</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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</table>

I object to the proposal to inset Send Business Park from the green belt because - There is highly restricted vehicular access along Tannery Lane in both directions - have you even been to see Tannery Lane see also Policy A42 above All these developments are int he green belt. Ripley is the first real village from London on the A3 and GBC seems intent on the destruction of these villages and the local countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to Policy 35 Development at Wisley Airfield. This has already been turned down by planning officers for all sorts of reasons including lack of infrastructure, lack of roads, destruction of Green Belt etc, so why has it reappeared in the Local Plan? The ground is beautiful open country covered with wild flowers and providing habitat for many wildlife species. The houses planned will generate so much traffic on our country roads and the A3 and M25, already very overstretched. The village of Ockham would be overrun with polluting traffic. Why are the Councillors so determined to spoil our surrounding countryside?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5997  Respondent: 10898145 / Louise French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy 42a Clockbarn Nursery Tannery Lane - 45 houses. Tannery Lane is a country lane with no pavements and is very twisting with many blind corners and restricted widths with no room for passing cars let alone the many bigger lorries and vans which serve the Tannery industrial site. 63 new apartments have already been granted planning permission at the Tannery, and together with the 45 houses at Clockbarn would generate a huge increase of traffic in the lane, which is also liable to flooding. The junction at Send Road is already dangerous with difficult sight lines.

Clockbarn is agricultural land which is now overgrown but is a habitat for deer, foxes, rabbits, bats and many birds. We do not want to see this wildlife disappear from our countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5998  Respondent: 10898145 / Louise French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A43/43a Garlick's Arch, 400 houses, industrial buildings and a two way interchange off the A3. This has been slipped into the Plan at the last moment and such development would effectively join up Send and Ripley. The Greenbelt was designed to provide green spaces between villages which would be destroyed. The development of this site would also generate so much traffic which would cause more pollution through Send and Ripley and bring the already crowded roads to a standstill during peak hours. The slip roads from the A3 would bring even more traffic through the
villages, much of which would end up in Old Woking, which is already a bottleneck through narrow roads which cannot be widened.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPS16/6000</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to Policy A44 Winds Ridge and Send Hill. Why has this area been chosen for development and slipped into the Plan at the last minute? Part of it is contaminated land, it is again on a narrow lane with traffic problems, and is unsuitable for building on. It is open grassland and a valuable habitat for wildlife and wild flowers which are so valuable to our wellbeing.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to various sites being taken out of the green belt. There is a lot of brownfield land which could be used but we all know that the developers like nice clean green fields for their developments and do not like brownfield sites because they are more difficult (ie more expensive) to build on</td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<th>Comment ID: PSLPA16/2326</th>
<th>Respondent: 10898433 / Karen Lynch</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</table>
Guildford Borough Council’s Proposed Submission Local Plan: strategy and sites

It is particularly disturbing that despite numerous pledges to the contrary from the Guildford Borough Council that the final draft Local Plan has been changed so fundamentally introducing many new sites and a staggering proposal to remove the village of Send entirely from the Green Belt without any proper consultation.

Let me start by objecting to the removal of the village of Send from the Green Belt which is a draconian proposal that has only appeared in the latest plan. The country side between Woking and Guildford offers amenities to the community that would be lost forever if the area was taken out of the Green Belt. There is no justification for this as there are numerous brownfield sites in the Borough that can be developed before resorting to this.

I object in general to all of the proposed development sites in Send as they were not included previously in the 2014 consultation and it seems to be a case of the Council making it up as they go along and hence it has bungled significant developments into Send where the housing proposals in particular far exceed the housing needs of the community. I object to the fact that these proposals have not been properly consulted on and all sited have changed substantially from the previous Local Plan as has the number of houses now being proposed to be built.

I object in particular to the fact that the only area for proposed new housing removed from the previous draft proposal is that behind [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]. This smacks as more than a touch of “NIMBY”ism. Even though he is not a member of the (Conservative) Guildford council, I find it extremely hard to believe that this change to the plan is not related to the fact that he is a member of the Cabinet.

I object to the proposed site off Send Hill to develop 40 houses and make space available for 2 Travellers pitches. Send Hill’s road network is totally inadequate for the existing residential needs in that it is a narrow width single track road and is incapable of coping with any heavy construction traffic let alone an increase to residential traffic. There is also no justification for this development as 40 new houses would totally swamp the existing residential area and change the community forever. I also object to this site as a location for the development of 2 traveller pitches as the access to this site will be totally inadequate and they are totally out of character with the surrounding community. In addition, previously there have already been crime issues reported relating to travellers who have passed through the area and still continue to pitch their caravans on the B2215.

I also object to the fact that if the development of the Send Hill site were to go ahead then it would introduce an element of danger to the school children who use Send Hill to go to school every day. Send Hill is a totally inadequate road network to accommodate heavy construction traffic and this increased congestion caused would be significant and dangerous. The traffic situation during school drop off and pick up times is already a concern in the area. The proposed new housing, with additional vehicles, would make this even worse.

I object to the development at Garlick’s Arch because the site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. This proposed development is not justified by any special circumstances and the fact that the Green Belt is meant to be permanent and not continually eroded. The fact that the site is also prone to flooding makes it an inappropriate site for development.

I object to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. This development should not be located here but moved to the Slyfield Industrial Estate where there is sufficient space for the additional 7,000 sq m of industrial space on its already zoned site. I object to this new proposed development being placed so close to residential communities.
I object to the proposed new interchange onto the A3 at Burnt Common as it would cause significant congestion into the local road network, in particular the A247, which struggles to cope with existing traffic loads. There is already significant congestion on the road network during peak travel hours in both the morning and afternoon and this new junction onto the A3 would increase this congestion throughout the remainder of the day. I also object to the fact that the air quality would dramatically deteriorate in the surrounding residential areas of Send village from this significant increase in traffic levels.

I object to the Plan as it is ill considered and not properly consulted upon with the changes from the previous plan being so material to the village of Send. I also object to the fact that local schools and doctors surgery in Send, which are struggling to cope with existing demand from residents, will be totally overburdened and unable to cope with the additional demand that would arise from this proposed increased housing. I also object to the fact that the infrastructure requirements have not properly considered and will be totally inadequate to deal with the new proposed housing and industrial developments in the village of Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3775  Respondent: 10898465 / John Lynch  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is particularly disturbing that despite numerous pledges to the contrary from the Guildford Borough Council that the final draft Local Plan has been changed so fundamentally introducing many new sites and a staggering proposal to remove the village of Send entirely from the Green Belt without any proper consultation.

Let me start by objecting to the removal of the village of Send from the Green Belt which is a draconian proposal that has only appeared in the latest plan. The countryside between Woking and Guildford offers amenities to the community that would be lost forever if the area was taken out of the Green Belt. There is no justification for this as there are numerous brownfield sites in the Borough that can be developed before resorting to this.

I object in general to all of the proposed development sites in Send as they were not included previously in the 2014 consultation and it seems to be a case of the Council making it up as they go along and hence it has bungled significant developments into Send where the housing proposals in particular far exceed the housing needs of the community. I object to the fact that these proposals have not been properly consulted on and all sited have changed substantially from the previous Local Plan as has the number of houses now being proposed to be built.

I object to the proposed site off Send Hill to develop 40 houses and make space available for 2 Travellers pitches. Send Hill’s road network is totally inadequate for the existing residential needs in that it is a narrow width single track road and is incapable of coping with any heavy construction traffic let alone an increase to residential traffic. There is also no justification for this development as 40 new houses would totally swamp the existing residential area and change the community forever. I also object to this site as a location for the development of 2 traveller pitches as the access to this site will be totally inadequate and they are totally out of character with the surrounding community.

I also object to the fact that if the development of the Send Hill site were to go ahead then it would introduce an element of danger to the school children who use Send Hill to go to school everyday. Send Hill is a totally inadequate road network to accommodate heavy construction traffic and this increased congestion caused would be significant and dangerous.
I object to the development at Garlick’s Arch because the site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. This proposed development is not justified by any special circumstances and the fact that the Green Belt is meant to be permanent and not continually eroded. The fact that the site is also prone to flooding makes it an inappropriate site for development.

I object to the proposed new interchange onto the A3 at Burnt Common as it would cause significant congestion into the local road network, in particular the A247, which struggles to cope with existing traffic loads. There is already significant congestion on the road network during peak travel hours in both the morning and afternoon and this new junction onto the A3 would increase this congestion throughout the remainder of the day. I also object to the fact that the air quality would dramatically deteriorate in the surrounding residential areas of Send village from this significant increase in traffic levels.

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I object to the Plan as it is ill considered and not properly consulted upon with the changes from the previous plan being so material to the village of Send. I also object to the fact that local schools and doctors surgery in Send, which are struggling to cope with existing demand from residents, will be totally overburdened and unable to cope with the additional demand that would arise from this proposed increased housing. I also object to the fact that the infrastructure requirements have not properly considered and will be totally inadequate to deal with the new proposed housing and industrial developments in the village of Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1031  Respondent: 10898625 / James Hampton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1550  Respondent: 10898625 / James Hampton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
I object to new sites (Garlicks Arch) being introduced as an after thought when it was not even considered in the previous plan. A slip road on the A3 at Burnt Common has been added to the Draft Local Plan without Highways England consent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to a totally unrealistic number of houses for the country lanes to absorb.

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---
I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/3405  Respondent: 10898625 / James Hampton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1358  Respondent: 10898721 / J Hawkins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to site A25 Gosden Hill Farm as an overdevelopment in the Green Belt. Again this is contrary to the stated aim in the Plan of trying to keep the Green Belt incursions to a minimum. It would be further insidious erosion of the Green Belt and reducing the area of land available to absorb rainfall while also increasing traffic problems as the area of the A3 there is a busy stretch of road at present.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<tr>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT to site A35 Wisley Airfield; the size of the planning is unsustainable for the location. It would be a loss of Green Belt, increased traffic on unsuitable country roads without proper infrastructure and local facilities.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I OBJECT to the late inclusion of site A43 Garlick’s Arch – a proposed development that will increase the risk of flooding in the area. It would increase the traffic problems on the local roads which are incapable of coping with an influx of traffic. The local infrastructure cannot cope and more facilities such as schools and surgeries would be required.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to site A43a the on and off ramp at Burnt Common/Clandon, this will increase the traffic problems in the villages not help them. The current status is that the roads are busy for large periods of the day, not just at peak hours and with many narrow roads and surfaces constantly in need of repair due to the current heavy traffic and extremes of weather. There are far more vans and lorries using these roads in recent years. This development would only exacerbate the current problems by hastening the need for road repairs, reducing the available surface area to absorb heavy rainfall causing flooding as well as reducing the village character of the area – this despite the stated aim of retaining our special heritage and landscape.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to site A45 The Talbot as causing overdevelopment in a conservation area, again, the local roads are narrow and unsuitable for heavy traffic. It can be difficult coping at present and building on this site would only exacerbate the problem.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I feel that the current infrastructure and services will not support the proposed scale of development. The Plan states a proposal to increase the number of cycle-lanes whilst people are forced to drive due to insufficient bus services to the outlying villages leading to an increase in the number of cars using the roads, although the Park 'n Rides do help to reduce the traffic into Guildford town centre. I have lived in Surrey for forty years and seen the insidious erosion of the Green Belt. Future development must take increased flood risks seriously and ensure that infrastructure and services are put in place before/alongside developments not afterwards. Smaller, more affordable houses should be built in preference to larger houses, especially on in-fill sites. This would dilute the strain on local areas while truly respecting the villages, Green Belt, landscapes and heritage sites that make the area a desirable location to live in.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I OBJECT to any “in-setting” or removal of any villages from the Green Belt. Again, this is contrary to the stated aims of the Plan to retain the special heritage and landscape; it appears to be a precursor to expand some villages into towns.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I OBJECT in general that priority is not on using brownfield sites, despite this being the stated aim in the Plan, but the insidious eating into the Green Belt and thus increasing the risk of flooding again despite your statement that flooding defences will be put in place. There is an increased risk of flooding now and in the future with change in patterns of rainfall. If fewer large expensive homes were built instead of smaller, more affordable housing less land would be required and more people could be housed per acre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

To remove Send Business Park from the Green Belt implies it will become further developed. The local roads are unable to cope with increased traffic and will deteriorate even faster. It is foolish to plan future development on the flood plain. Areas will be cut off by flooding because the entire area is low-lying and there would be no alternative routes. It is sometimes difficult to find a route at present when there is flooding; it would be worsened by further development. The local lanes and roads are unsuitable for heavy traffic. These plans will not improve our quality of life, nor would the extra pollution which would result from the increase in traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It will cause worse flooding in the Tannery Lane area. If the Marina is built there it will exacerbate traffic in an area of narrow, poorly surfaced lanes. It will be eroding the Green Belt and will impact on the Wey Navigation.
The original plan for 45 homes was excessive and to increase it by a third is ludicrous. The increase in population will strain existing resources and infrastructure.

The increase in traffic will worsen an already heavily used road system in both directions, towards Send, Ripley and Clandon and also towards Old Woking a busy junction already.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2521  Respondent: 10898721 / J Hawkins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is still a designated flood zone.

It will mean further loss of Green Belt and by linking Send/Clandon and Ripley almost to Burpham negates the key purpose of the Green Belt.

It will destroy ancient woodland which will increase the risk of flooding.

The excess traffic is unsustainable and will cause extra wear on already poor roads.

The area cannot sustain the increase in population and cars which would result in overloading the infrastructure.

There are gypsy sites close by and no demand for sites for Travelling Showpeople in this location.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2522  Respondent: 10898721 / J Hawkins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The change in wording to minimum from maximum implies plans for even more industrial development.

There is no need for industrial development on this scale, nor in the Green Belt. There are other more suitable sites such as Slyfield which are not being used to capacity. It would seem that demand is diminishing not increasing.

Again, the increased traffic would make life for the existing residential population intolerable. The roads barely cope with the current level of traffic and are frequently gridlocked by road works, road closures for repairs such as the bridges being and other traffic problems in the vicinity including the frequent problems on the M25.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/3659  **Respondent:** 10899137 / Justina Buswell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. I Object to Send Village being removed from the Green Belt. This is designed to separate villages such as Send from towns such as Woking and Guildford, preventing urban sprawl and being the ‘lungs’ of cities. Local councillors and central government gave reassurance in the election that Green Belt would be protected and this is contrary to those promises.

2. I Object to building 45 houses at Clockbarn Nurseries. This is totally inappropriate use of this land. There is inadequate access, Tannery Lane is a small country lane and should remain as such. This area can already be hazardous, especially for vehicles trying to join Send Road, and this volume of traffic is already destined to increase the building of 64 apartments at The Tannery and the Marina on the canal. This lane will not be able to take any more traffic and should not be increased in size to accommodate any extra vehicles.

3. I Object to building 400 houses and 7000 sq metres of industrial space at Garlick’s Arch, opposite Send Marsh Road. This site is covered in ancient woodland, which should be preserved. The site is prone to extensive flooding. The industrial space, if required, should be sited at Slyfield and the extra housing is surplus to Guildford’s housing requirement.

4. I Object to the development of 40 houses and travellers’ pitches at Send Hill. Again this is sited on a single track country lane, in a village location with insufficient access. This area was used for landfill and would be unfit for development due to the nature of the landfill.

5. I Object to a new interchange with the A3 at Burnt Common. Send and Ripley already become gridlocked when there is an accident on the A3 or M25, which is a frequent occurrence. If the proposed plans for 2000 houses at Wisley Airfield, 2000 houses in Burpham and 1850 at Blackwell Farm go ahead: Send would have to somehow accommodate this traffic. Noise from the A3/M25 is already excessive, as is air pollution and any increase in traffic would have a hugely detrimental effect on the local population.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/3964  **Respondent:** 10899137 / Justina Buswell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

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Page 578 of 2167
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I Object to Send Village being removed from the Green Belt. This is designed to separate villages such as Send from towns such as Woking and Guildford, preventing urban sprawl and being the 'lungs' of cities. Local councillors and central government gave reassurance in the election that Green Belt would be protected and this is contrary to those promises.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7395  Respondent: 10899137 / Justina Buswell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I Object to building 45 houses at Clockbarn Nurseries. This is totally inappropriate use of this land. There is inadequate access, Tannery Lane is a small country lane and should remain as such. This area can already be hazardous, especially for vehicles trying to join Send Road, and this volume of traffic is already destined to increase the building of 64 apartments at The Tannery and the Marina on the canal. This lane will not be able to take any more traffic and should not be increased in size to accommodate any extra vehicles.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7396  Respondent: 10899137 / Justina Buswell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I Object to building 400 houses and 7000 sq metres of industrial space at Garlick’s Arch, opposite Send Marsh Road. This site is covered in ancient woodland, which should be preserved. The site is prone to extensive flooding. The industrial space, if required, should be sited at Slyfield and the extra housing is surplus to Guildford’s housing requirement.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7397  Respondent: 10899137 / Justina Buswell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I Object to a new interchange with the A3 at Burnt Common. Send and Ripley already become gridlocked when there is an accident on the A3 or M25, which is a frequent occurrence. If the proposed plans for 2000 houses at Wisley Airfield, 2000 houses in Burpham and 1850 at Blackwell Farm go ahead: Send would have to somehow accommodate this traffic. Noise from the A3/M25 is already excessive, as is air pollution and any increase in traffic would have a hugely detrimental effect on the local population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3510  Respondent: 10899137 / Justina Buswell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to policy A42 change at Clockbarn in Tannery Lane where there has been an increase from 45 homes to 60. This change takes no account of hundreds of previous objections made by local residents. The increase in numbers of homes will have a seriously detrimental effect on the traffic in the area, particularly as Tannery Lane is a small country road and should remain as such. This development is a significant erosion of the Green Belt in our area and is totally out of keeping with the rural nature and views across the River Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3515  Respondent: 10899137 / Justina Buswell  Agent:
**Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to policy A43 change at Garlick’s Arch for the following reasons: Again this change totally disregards the thousands of previous objections. It is a beautiful area of Green Belt with very valuable and beautiful ancient woodland – something which is totally irreplaceable. It is a massive development for a village of this size causing Ripley and Send to join up, something which Green Belt land is designed to prevent. Again – another development in this area will massively increase the congestion on surrounding roads, something which is already a particular problem in our area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3518  Respondent: 10899137 / Justina Buswell  Agent:

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**Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to policy A58 at Burnt Common, London Road - which was deleted from the 2014 draft plan because of objections made previously. It is totally unnecessary and inappropriate to build industrial units on Green Belt land in a village of this size. There are already suitable and available sites within Slyfield and Guildford. Again any increased movements of industrial vehicles on the surrounding roads will lead to total gridlock.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1733  Respondent: 10899137 / Justina Buswell  Agent:
Green Belt Policy 2, at paragraph 4.3.15; I object to the proposal to inset Send Business Park from the Green Belt for the following reasons:

It is a non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation.

Tannery Lane, as previously mentioned, is a small country lane which should remain as such and is totally unsuited to increased traffic volume.

Any additional expansion or development in this position will have a significantly detrimental effect on the Green Belt land in this location.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2640  Respondent: 10899233 / Frederick Hookins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/513  Respondent: 10899233 / Frederick Hookins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to Policy P2. the removal of Send from the Green Belt, this I believe to be against Government policy. Since the suggestion that Send be removed from the Green Belt Aldertons Farm has been neglected the hedges have not been cut, the fences are falling down. and the fields have not been cut probably hoping for planning permission.

I object to policy A 43 Land at Galick’s arch Burnt Common as this is not required, also the woodland on this site as most of it is ancient woodland and planning permission should not be granted, also this land floods each winter and could cause flooding in Send Marsh, and possibly the A3,
I feel that Guildford Borough Council have not followed the correct process the number of houses has changed from 430 in 2014 and went down to 185 in 2016 and has now go up to 485 these significant changes require another full consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/821  Respondent: 10899233 / Frederick Hookins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Send and Ripley being removed from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5527  Respondent: 10899233 / Frederick Hookins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 Gosden Hill as being totally a inappropriate and unsustainable development of 2000 homes in the Green Belt which will cause coalescence and urban sprawl from Burpham to West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5491  Respondent: 10899233 / Frederick Hookins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt.

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1349  Respondent: 10899233 / Frederick Hookins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the building of 45 houses at Clockbarn Nursery as Tannery Lane is very narrow and cannot take any more traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1351  Respondent: 10899233 / Frederick Hookins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the building of 400 houses and 7000 sq metres of industrial space at Garlicks Arch. This site is covered by ancient woodland the industrial space is not needed, also the site floods in the winter and converting it over will cause flooding in either Send Marsh or the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I OBJECT to the inclusion of strategic site Policy A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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<tr>
<td>I object to the building of a new interchange with the A3 at Burnt Common as this will cause gridlock through Send which is already grid locked most days. I would like my comments are shown to the planning inspector who will decide. I would like a confirmation that my communication has been received by Guildford Council.</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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<tr>
<td>I OBJECT to Policy A43a, the proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the development of 40 houses and 2 travellers pitches at Send Hill.</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Comment ID: PSLPP16/2784</td>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

My name is Frederick Hookins [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

I am writing to object to the plan to take Send and Ripley from the Green Belt which was intended by the government to protect the countryside. Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10827</th>
<th>Respondent: 10899233 / Frederick Hookins</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/10846  Respondent: 10899233 / Frederick Hookins  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10786  Respondent: 10899233 / Frederick Hookins  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by over development in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3895  Respondent: 10900065 / Jenny and Guy Marshall  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to any removal of villages from the Green belt and to the disproportionate amount of development in one area of the borough and I object to the lack of any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3899  Respondent: 10900065 / Jenny and Guy Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to any removal of villages from the Green belt and to the disproportionate amount of development in one area of the borough and I object to the lack of any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3896  Respondent: 10900065 / Jenny and Guy Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Ripley has had many houses built anymore will change this lovely village to a town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3900  Respondent: 10900065 / Jenny and Guy Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

Ripley has had many houses built anymore will change this lovely village to a town.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<tr>
<th>Comment ID: PSLPS16/7279</th>
<th><strong>Respondent:</strong> 10900065 / Jenny and Guy Marshall</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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</table>

As a resident of Ripley I write to object to the local plan as the proposed development is not sustainable and I also object to the late inclusion of sit A43a Garlicks Arch.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<tr>
<th>Comment ID: PSLPS16/7273</th>
<th><strong>Respondent:</strong> 10900065 / Jenny and Guy Marshall</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
</tr>
</tbody>
</table>

As a resident of Ripley I write to object to the local plan as the proposed development is not sustainable and I also object to the late inclusion of sit A43a Garlicks Arch.

I object to site A43a the on and off ramp at Burnt Common which will only lead to yet more traffic congestion.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPS16/7280</th>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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</table>
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A43a the on and off ramp at Burnt Common which will only lead to yet more traffic congestion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7274  Respondent: 10900065 / Jenny and Guy Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A45 the Talbot another overdevelopment in a conservation area. I object to site A25 Goaden hill farm another massive overdevelopment in the Green Belt as is site A35 Wisley airfield inappropriate and unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7281  Respondent: 10900065 / Jenny and Guy Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A45 the Talbot another overdevelopment in a conservation area. I object to site A25 Goaden hill farm another massive overdevelopment in the Green Belt as is site A35 Wisley airfield inappropriate and unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/7275  Respondent: 10900065 / Jenny and Guy Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A57 The paddocks - 4 traveller pitches.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7282  Respondent: 10900065 / Jenny and Guy Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A57 The paddocks - 4 traveller pitches.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4087  Respondent: 10900257 / Mark Norman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Housing at Gosden Hill

I fail to understand how the SHMA has given a housing need higher than the estimate only four years ago. I believe the assumptions to be over estimated particularly now in the uncertain position of coming out of Europe an hence the reduction in migrant and London displaced population. These needs complete reconsideration.
Traffic generated by the Gosden Hill development.

There is only a suggestion of a 2 way new A3 southbound off and on intersection at Burpham, for the main access for the vehicles in the development as well as the park and ride, I estimated at over 3,000 cars will have to enter Burpham, use the A3100 (Clay Lane) to re-join the A3 northbound. This is already a heavily used road and since the building of Aldi the traffic has become worse, often queuing from the round about on Clay Lane back to the round about by Stoke Park. This cannot be sensible despite I'm sure relying on computer models- we all know they can be wrong and rely on a human building them and making assumptions in the first place. Assumptions can be adjusted to achieve the desired outcome.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/8617  Respondent:  10900257 / Mark Norman  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Utilities - Burpham

The current utilities, in particular the sewage system, electricity supply and water are already at capacity for the existing residents. I don't believe the size and operation of the sewers in particular have been taken into account. There would be a requirement for significant upgrade, not considered here nor the impact of how such massive sewers would get beneath the A3 and back to the sewage plant on Slyfield

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/8616  Respondent:  10900257 / Mark Norman  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to Guildford Borough Council's Local Plan June 2016 as I believe its is unsound an far too aspirational.

I believe the order and timing of the proposals around housing, transport and infrastructure are incorrect.

Transport A3
Transport should be the first decision to be taken. This should first be about the A3, how the volume of traffic southbound at the Burpham turnoff can be handled as well as elevating the traffic jams on the A3 through Guildford. The proposed tunnel entrance would sit on the Gosden Hill site. By allowing housing to be built on this site before the decision on the A3 would remove this key tunnel entrance site for relieving the traffic through the whole of Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8619  Respondent: 10900257 / Mark Norman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

London Road Burpham

The designation of the London Road as a sustainable movement corridor to have a dedicated bus lane and cycle lane is not appropriate. I suggest that you come and look at the road at rush hour, it crawls along and with increased development the traffic will only get worse. Even if it were flowing the road width is constrained, how 4 lanes could be incorporated is beyond belief.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8620  Respondent: 10900257 / Mark Norman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Over development in one area

How can it be conceived as acceptable that 2000 homes be built in Burpham which grows a village by nearly double. Just because its easy to find land on the edge of the town doesn't make it the right choice if the infrastructure isn't in place or the order of decision making on housing precludes solving the problem of the A3 for the whole of Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPA16/864</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the lack of any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the lack of immediate provision for new schools.

I strongly object to the lack of any immediate provision for Doctors Surgeries.

I strongly object to the lack of any immediate provision for a new hospital. The Royal Surrey hospital already serves a vast length of the A3 road as the next hospital going south is Portsmouth. The Royal Surrey hospital and other major hospitals situated in the county of Surrey are already stretched to the ultimate limits.

I strongly object to the lack of any immediate provision for new roads to link local and neighbouring towns. The existing roads are already grid locked not only at peak times but now throughout the day with the slightest incident that brings chaos to the local roads. Junction 10 of the M25 the main hub for Heathrow and Gatwick airports is now regularly at a standstill throughout the day. The proposed 2016 Draft Local Plan would result in many thousands more vehicles (ie cars and commercial vehicles) attempting to get on the M25 at junction 10 and also using the local roads that link towns.

I strongly object to the lack of any immediate provision for new transport links. With grid locked roads new railway tracks will have to be laid. The London underground system will now need to expand into the Guildford Borough especially with a link to the airports also local towns and neighbouring borough towns as all of the current road structure will become impossible to use.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/2894  Respondent: 10900385 / Michael Mills  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to all erosion of the Green Belt. Especially as the electorate in the last local elections were promised that the elected councillors would protect the Green Belt

I strongly object to any "in-setting" (ie removal) of any villages from the Green Belt. The proposed 2016 Draft Local Plan by these elected councillors will destroy the local villages of which they were elected on their promise to keep the Green Belt currently surrounding these villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2895  Respondent: 10900385 / Michael Mills  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the disproportionate amount of development in one area of the Borough. The current infrastructures in all of these areas of the Borough are already stretched to the ultimate limits.

I strongly object to the limited consultation period.

I strongly object to the last minute inclusion of new sites with less than two weeks notice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1332  Respondent: 10900609 / Beverley Gear  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I strongly object to the final draft local plan and I want my comments below to be seen by the Inspector.

I object to the way that Guildford Borough Council has altered their original plans for the developments in Send and in doing so, by using regulation 19 they are attempting to shortcut the process. Having not followed the correct procedure, this must NOT be allowed.

I object to Send and Ripley being removed from the Green Belt. If this is allowed to happen, it will set a precedent and the majority of Surrey could lose its status. Election promises were to protect the Green Belt!!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2389  Respondent: 10900609 / Beverley Gear  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Garlick's Arch being built on as it is a site which is covered in ancient woodland and should be preserved as such. Once our history is destroyed, it will be gone forever and there will be no going back.' The local road infrastructure for Send and Ripley is not suitable if the Garlick's Arch proposal for industrial and housing developments are allowed to go ahead.

The local roads are totally unsuitable for HGV's and any large increase in general traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2390  Respondent: 10900609 / Beverley Gear  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a 4 way interchange on the A3 at Burnt Common as this would be catastrophic for Send as this would be the through route to Woking from the M25 and A3. With additional traffic for the proposed 2000 houses at Wisley and also 2000 at Burpham, Send cannot and must not take this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<tr>
<th>Comment ID: PSLPS16/2391</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to the proposal for land in Send Hill to be used for 40 houses and 2 travellers pitches. Again this is new proposal which has not been previously consulted upon. This area has permanent Green Belt status and the beautiful area would be spoilt by any development. The existing site is currently vented as it has unsafe landfill waste and should not be used. The 2 travellers pitches are also inappropriate because the narrow single track lane would provide insufficient access to the site with their large vehicles, especially the access from the bend on Potters Lane which is extremely dangerous!</td>
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<th>Respondent: 10900609 / Beverley Gear</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>The village school is over-subscribed so has no places for additional pupils. This would mean any additional children in the area would have to go to schools further afield, thus causing even more congestion on the already too busy local roads during rush hour. With all the extra proposed traffic, Send could possibly be gridlocked all day.</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to increases in traffic as the air quality will be compromised and will have a bad effect on residents who already have breathing problems and it may actually increase the amount of people suffering in the future. I also object to this because the local doctor's surgery may not be able to cope with a large influx of new patients from new housing developments - on occasions it is difficult to get an appointment for several days.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5296  Respondent: 10900609 / Beverley Gear  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is not the need for such a large amount of housing as GBC has suggested. I realise that there is a need for housing but not to the detriment of losing Green Belt, congested roads, over-subscribed schools and doctors. The South East of England is already highly populated and there are other areas of England which would be more suitable to have larger housing developments.

In my opinion, these developments should NOT be approved and NOT be allowed to go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/880  Respondent: 10900641 / E.J. Mills  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I strongly object to the lack of any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2923  Respondent: 10900641 / E.J. Mills  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I strongly object to the lack of immediate provision for new schools.

I strongly object to the lack of any immediate provision for Doctors Surgeries.

I strongly object to the lack of any immediate provision for a new hospital. The Royal Surrey hospital already serves a vast length of the A3 road as the next hospital going south is Portsmouth. The Royal Surrey hospital and other major hospitals situated in the county of Surrey are already stretched to the ultimate limits.

I strongly object to the lack of any immediate provision for new roads to link local and neighbouring towns. The existing roads are already grid locked not only at peak times but now throughout the day with the slightest incident that brings chaos to the local roads.

Junction 10 of the M25 the main hub for Heathrow and Gatwick airports is now regularly at a standstill throughout the day. The proposed 2016 Draft Local Plan would result in many thousands more vehicles (ie cars and commercial vehicles) attempting to get on the M25 at junction 10 and also using the local roads that link towns.

I strongly object to the lack of any immediate provision for new transport links. With grid locked roads new railway tracks will have to be laid. The London underground system will now need to expand into the Guildford Borough especially with a link to the airports also local towns and neighbouring borough towns as all of the current road structure will become impossible to use.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2919  Respondent: 10900641 / E.J. Mills  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I strongly object to the 2016 Draft Local Plan for the following reasons.

I strongly object to all erosion of the Green Belt. Especially as the electorate in the last local elections were promised that the elected councillors would protect the Green Belt

I strongly object to any "in-setting" (ie removal) of any villages from the Green Belt. The proposed 2016 Draft Local Plan by these elected councillors will destroy the local villages of which they were elected on their promise to keep the Green Belt currently surrounding these villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2920  Respondent: 10900641 / E.J. Mills  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to any "in-setting" (ie removal) of any villages from the Green Belt. The proposed 2016 Draft Local Plan by these elected councillors will destroy the local villages of which they were elected on their promise to keep the Green Belt currently surrounding these villages.

I strongly object to the disproportionate amount of development in one area of the Borough. The current infrastructures in all of these areas of the Borough are already stretched to the ultimate limits.

I strongly object to the limited consultation period.

I strongly object to the last minute inclusion of new sites with less than two weeks notice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18172  Respondent: 10900897 / Mark Timmings  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Again, it appears that no thought has gone into the infrastructure required for this excessive number of properties. The villages of Send and Ripley are already heavily congested during peak times with pollution from excessive traffic and yet you appear to intend to increase this by a massive amount. Schools are already heavily oversubscribed and doctor surgeries require you to know you’re going to be ill before booking an appointments as they’re so busy.

I see no intention for providing better footpath or cycle lanes or anything else to improve existing road systems.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/18173  Respondent: 10900897 / Mark Timmings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object (yet again) to the local plan. I see no improvement since the last local plan and in fact it appears things have got even worse!

The development is ridiculous in the extreme, it will destroy the village communities of Ripley, Send and Clandon. We neither have the infrastructure to support this level of development or (frankly) the need. I strongly disagree with the seeming disregard for the green belt which will ultimately connect everything creating an urban sprawl.

Yet again I note that there are no exceptional circumstance to the destruction of the greenbelt save making some building firms very rich, why not instead look to develop/redevelop brownfield sites before looking to destroy the countyside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/1745  Respondent: 10901089 / Wendy M. Bew  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/55  Respondent: 10901121 / Bernie Hales  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the lack of any evidence for the alleged housing need numbers
2. I object to the lack of immediate provision for new schools
3. I object to the lack of immediate provision for Doctors Surgeries

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/157  Respondent: 10901121 / Bernie Hales  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I Object to the 2016 Draft Local Plan,

The items listed below are being objected to as subjects not addressed by the Planning Policy of Guildford Borough Council.

1. I object to all erosion of the Green Belt
2. I object to any "in-setting" (Removal) of any villages from the Green Belt
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/158  Respondent: 10901121 / Bernie Hales  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the disproportionate amount of development in one area of the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/125  Respondent: 10901121 / Bernie Hales  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the limited consultation period
   2. I object to the last minute inclusion of new sites with less than 2 weeks notice

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5301  Respondent: 10901697 / JM Long  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A28

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Correct title of Policy A28 to say Ash Green, and not Ash.

* Policies A27, A28 and A29 collectively increase Ash Green village by 50%. Opportunity exists under Policy A28 to provide a village/community hall and recreational area which would provide Ash Green with much needed community and social space.

Opportunities (1) Should read: "To create a centre for the village by including a village hall with associated recreational space providing much needed facilities for the Ash Green community. A mix of homes (C3) and accommodation for older people (C2) could be appropriate for this site."

* Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Correct title of Policy A28 to say Ash Green, and not Ash.

Opportunities (1) Should read: "To create a centre for the village by including a village hall with associated recreational space providing much needed facilities for the Ash Green community. A mix of homes (C3) and accommodation for older people (C2) could be appropriate for this site."

Attached documents:

Comment ID: pslp172/5302  Respondent: 10901697 / JM Long  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the "historic location of Ash Green", is inadequate and would need rewording to prevent this increased potential for coalescence.

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road have historically been considered to form part of Ash Green village. Whilst this land is now proposed to be included within the Ash and Tongham urban area, Proposals for the land west of this road and to the south east of Foreman Road / White Lane should respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This should include the provision of a green buffer that maintains a sense of separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help
soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"

• Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."

• Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

• Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.

a) The Street in Tongham
b) A331/A323 intersection
c) A31 /White Lane junction

• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"

Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."

Attached documents:

Comment ID: pslp171/3339  Respondent: 10901697 / JM Long  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy P3 - Countryside

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road
- 4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Given its relative sustainability, Countryside to the south and east of the urban area within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."
- 4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."
- Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."

4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."

Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

Attached documents:
## Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

The surrounding roads are already gridlocked and could not accommodate the increase in traffic caused by such a large development.

With regard to the building of a new school on the site. There is no proven need for another secondary school in this area. The existing schools still have capacity to take more pupils and would be willing to extend if necessary.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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## Comment ID: PSLPP16/5944    Respondent: 10901761 / L Pike    Agent:

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4**

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

Normandy has a serious problem with flooding from surface water as well as the sewage system which is very inadequate at times of high rainfall.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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## Comment ID: PSLPS16/6599    Respondent: 10902401 / Nick Enderby    Agent:

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42**

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
I strongly object the building of 45 houses opposite my property at Clockbarn Nurseries for the same reasons that I have argued against development on that plot previously: Tannery Lane is too narrow to withstand extra traffic; the junction between Tannery Lane and Send a Road is already very hazardous and with the planned marina and additional buildings the road is already at capacity. Scant regard has been given to previous objections and, quite frankly, enough is enough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPS16/6601  | Respondent: 10902401 / Nick Enderby | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a new interchange with the A3 at Burnt Common as the area traffic generated would cause significant congestion in an area that it is already gridlocked at peak times.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPS16/6600  | Respondent: 10902401 / Nick Enderby | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the development of 40 houses and travellers pitches on Send Hill. This is an area of rural beauty and to create such a development would completely undermine the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/13822  | Respondent: 10902401 / Nick Enderby | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to Send Village being removed from the green belt as it creates a natural and much needed division between neighbouring villages

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/4152  Respondent: 10902561 / Maureen Ruddock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The ridiculously large numbers of houses proposed to be built in the borough particularly in the Horsleys where my family live. I understand that this huge number of houses has been arrived at from a Strategic Housing Market Assessment (SHMA) developed by a consultant’s mathematical model which has not been revealed in the plan nor to Guildford Borough Council (GBC). The proposed number of houses has then been further increased by GBC, the effect of which has been to give a population increase which is almost 70% higher than the official national estimates for population growth in the Borough. The effect of this is to increase the population of West Horsley by circa 35%. It is both unfair and unreasonable to increase the population of an area so drastically - it will change the face of the Horsleys forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17072  Respondent: 10902561 / Maureen Ruddock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. Infrastructure already at breaking point. No regard has been given to the infrastructure which is already inadequate to meet the current level of population in the Horsleys, never mind an increased population. The schools are oversubscribed, parking in the village is a nightmare, the Medical Centre is over stretched with big waiting times to get doctors’ appointments, the trains are overcrowded and the roads around the Horsleys are gridlocked at peak times now. The quality of life for those currently living in the Horsleys and for those who move to the new houses proposed will drastically deteriorate if these new housing proposals go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17074  Respondent: 10902561 / Maureen Ruddock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

1. The Proposal to remove the Horsleys from the Green Belt. This is simply outrageous. The Green Belt should be sacrosanct – once it is gone, it will be gone forever. It should not be tampered with and should be allowed to remain to be enjoyed by future generations just like our generation has enjoyed it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17073  Respondent: 10902561 / Maureen Ruddock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

1. The extensive developments proposed in other areas of the borough eg in Burpham (2000 houses & mixed use developments), Burnt Common, Gosden Hill Farm and Garlicks Arch to name a few. If all these developments are implemented, the character of the area will be changed forever. It will no longer be semi-rural but will become increasingly urbanised and will begin to resemble a concrete jungle. The majority of the people who live here have moved here because they do not want to live in an urban conglomeration. If this mass housing expansion goes ahead, the wishes of the majority of the existing local population will have been ignored so much for democracy! It is also completely scandalous that the proposed development at Garlicks Arch was “sneaked in” at the last minute. Please respect the wishes of the local people. We all understand that some limited housing development is needed but not these huge numbers proposed and this development should be undertaken on brownfield sites of which there are still plenty in Guildford and Woking.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/1889  **Respondent:** 10902561 / Maureen Ruddock  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I particularly object to the underhand way in which those seeking to implement the new Guildford Local Plan have gone about things. They have not informed the local population that their objections a year ago would not count. I have only heard through social media that it was necessary for me to write in again and object. Once again so much for democracy! We are supposed to live in a democratic country but the underhand way in which the people responsible for developing the new Guildford Local Plan have gone about things is an absolute disgrace and flies in the face of democracy. I suspect many of the local population are not even aware that their objections last time do not count and of the need to write in and object again – Guildford Borough Council should hang it’s head in shame!

I sincerely hope that my objections will be taken into consideration with regard to the new Guildford Local Plan and that my faith in democracy will to some extent be restored but sadly, I doubt that the local population’s wishes with regard to the area they live in will be respected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/3935  **Respondent:** 10902817 / TJ Deacon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the figure of 693 new homes per annum being used as a basis for planning. As I understand, no evidence has been made available to substantiate this or if it has, it has not been made public at the time of launch of the Draft Local Plan. This is unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Site A43 – I object to the proposal of potentially 400 Homes and 7000 sq m of industrial and warehousing use. I object on 3 grounds as follows:-

The number of 400 is completely out of proportion to the Send area existing population

The infrastructure is already inadequate as detailed for Site A43a.

The site includes a large area of ancient woodland which cannot be replaced.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Site A43a - I object to the proposed new northbound slip roads. The volume of traffic at present using the A247 is already excessive both morning and evening with extensive traffic queues in both direction on the A247 creating significant pollution and the use of rat runs attempting to avoid the queues. New slip roads can only increase this as traffic attempts to join and leave the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the removal of large areas of villages from the Green Belt. I moved to this area because the area was protected by the Green Belt from excessive development. The villages are vital to the health of Guildford as a borough maintaining the rural feel of the borough. Green Belt status should not be removed from any area without full examination of alternative sites to meet the exceptional need of the development. Removing the status removes the requirement to carry out this examination. The character of the villages within Guild for Borough boundary do make a significant contribution to the openness of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and
many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  - The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  - The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  - The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  - The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  - The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  - The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Re: Guildford Local Plan concerning the Horsleys

As a lifelong resident of the Horsleys I should like to raise my comments on the Local Plan.

Development of plots near St Martin's Close, East Horsley; and Thatcher's Hotel

The proposal to build houses on these brownfield sites offers a good opportunity for development. However, the plan does not make clear the plans for infrastructure and amenities that increased housing presents.

1. Parking and traffic

It is proposed that two sites near StMartin's Close will each contain 15 houses and the third 10 houses. The document gives no information as to the size of proposed houses to be built on the site but from the density of the proposed houses it would appear that they are to be terraced. The 10 current houses and 4 maisonettes on StMartin's Close are also terrace/semi detached and do not have driveways. Therefore all traffic from the current houses and maisonettes park on the road. Basing this on an average of at least 1.5 cars per household for the borough of Guildford and accounting for the fact that each house has a garage this still means that there are upwards of 7 cars parked on the road already. There is a small car park behind the houses but this is predominantly used by people working in the parade of shops at Bishopsmead and the postmen/post vans. People parking on StMartin's Close include visitors to the sheltered housing, members of bowling club, staff and visitors to Limegrove Residential Home, and users of the StMartin's church. This means that demand for parking is high and often all available parking is taken. If the new houses are not to include sufficient parking further demand will be put on StMartin's Close and its current residents. The plan also does not make clear where the access road to the new houses would be located. St Martin's Close, with cars parked, becomes a single laned road along which cars pass in both directions. Increased traffic flow to the new houses would make passage along this road more difficult. Is it proposed that access to the new houses would be from the main road? If access to the new development is from the existing roads in the Close, or the access road to the garages, I would object most strongly to the proposed development.

The proposed development of Thatcher's hotel will also increase the number of cars using the A246 and roads though the village. The junction onto the A246 from the village is already highly congested at peak times, with traffic waiting considerable amounts of time to join the A246/turn into Ockham Road South. If such a development does take place how will this junction be improved?

1. Drainage

Is the current drainage system able to accommodate waste water from an additional houses? Also, will there be a reduction of land into which rainwater can drain? The current Local Plan does not include flood information from the previous few years where the village was adversely affected by the amount of rain that we had. This meant that access out of the village became difficult as the access road to the A3 was flooded from about Christmas until March/April. This meant that East Horsley encountered increased traffic using the A246 to exit the Horsleys.

3.Schooling

Increased housing will mean increased numbers of children. The local school, The Raleigh, is the only state school in the Horsleys, is already over-subscribed and does not have the space to expand further. New classrooms had to be added in 2012/2013 to accommodate the current children being educated. Northcote and Nightingale Crescents, on which the school is located, are small village roads meaning that parking is very problematic with daily traffic jams and difficulty for local residents trying to leave or return to their houses. Traffic starts arriving at the school from 7.30am for the breakfast club and continues until past 6pm for the after school club.
Children from the Raleigh school then attend the Howard of Effingham Secondary School. This school is also over-subscribed and historically (in 2007) pupils from the Raleigh School were sent to other secondary schools in the Surrey area, many much further away and taking hours to access by public transport (Therfield at Leatherhead, the 5th nearest SCC secondary school to East being 11.8km away; ranked 51 out of 86 in Surrey for GCSE passes; Bishop David Brown at Sheerwater, the 9th nearest school at a distance of 12.5km; ranked 83 out of 86 in Surrey for GCSE passes; and Christ's College and Guildford, the 13th nearest school at a distance of 13/8km; ranked 84 out of 86 in Surrey for GCSE passes).

Although this led to children at the Raleigh being assured of a place at the Howard of Effingham Secondary School further increasing the demand for places from Horsley children may mean that such a scenario happens again.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4084  Respondent: 10902977 / Catherine Foy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A40

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Development of greenbelt land in the Horsleys (plots: Waterloo Farm, Manor Farm, East lane, Bell and Colville, Ockham Road North

1. Is the information on which the housing projects been made sound?

Population forecast form the ONS- recent data from the ONS (SNPP 2012) suggest that migration into the borough is much lower than the figures used when the Local Plan was compiled. In addition international migration accounts for between a half and two thirds of Guildford's population growth and it is this international migration that is now being discouraged by central government further reducing the need for such a large number of houses to be built. Therefore, proposed building should be adjusted likewise. Before development is allowed to encroach on greenbelt areas existing brownfield sites must be used and then an assessment as to the need for more houses made.

1. How will the proposed increase in houses affect the character of the Horsleys?

NPPF paragraph 158 states that "Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.” How have the Horsleys been defined as a Rural District Centre? The draft Local Plan states that Station Parade has a large supermarket. Surely Budgens cannot be described as a large supermarket, being classified under the Sunday Trading Act 1994 as a small shop or convenience store? The classification of the Horsley as Rural District Centre is flawed and as such must be amended and the impact of this classification on the local plan corrected.

In addition, the local plan proposes to increase the number of houses in the Horsleys by nearly 35%+. How can such an increase in the number of houses preserve the character of the area? Such an increase will result in the villages no longer being villages.

1. Has sufficient provision been made for infrastructure and amenities?

• parking
• roads
• schools
• public transport
• medical facilities
• drainage

The local plan needs to consider the parts of a development needed in addition to houses. If a village or town were being built from scratch houses would form just a small proportion of the overall development. Other areas to be considered would include drainage, roads, schools, medical facilities, shops, parking. In my comments on the use of StMartin's Close site for development I have touched upon current demands on schools, drainage, parking-all of which will be further negatively impacted by allowing development of the greenbelt areas of the Horsleys.

Development of the greenbelt areas and the potential influx of people into the village will also place further demand on public transport. Horsley station is already very busy with trains being very full. The Horsley bus service is sporadic and often not at times or bus stops that are convenient or needed.

Greater numbers of people will also place demand on the local Medical Centre where booking an appointment that is not required as an emergency can be difficult.

More people will also mean more cars. The Horsleys are villages with roads that are typical of a village-being winding and narrow. These roads are already suffering from increased traffic flow and delivery lorries, becoming pot holed and of a poor standard. The roads are also used by other people. The Horsley are popular with cyclists, especially following their inclusion in the Olympic cycle route. On many of the roads visibility, due to the winding and narrow nature of the roads, is poor meaning that overtaking cyclists is often risky and dangerous. Further road users would make the roads more congested and dangerous. Many of the village roads have no pavements meaning that pedestrians have to walk along the narrow winding roads. More cars will deter pedestrians further adding to the number of cars on the road.

**Guildford Borough Council’s use of terminology**

How much control will GBC have over future development as the plan uses language where developers are "expected and should follow" what GBC say? This language is non directive. Surely developers must and should be required to comply with GBC directives on the houses built.

In conclusion, although there is a need for increased provision of housing in the borough I feel that the data on which the local plan has been based is flawed, meaning the conclusions based on these figures not sound. In addition, the plan has made no consideration as to retaining the character of the villages or infrastructure and amenities that a large development would need.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

<table>
<thead>
<tr>
<th>I strongly object to the above development proposed. I have lived in the village for about 46 years and in that time the traffic problem has increased hugely. More houses and particularly a school can only aggravate the problem.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Is there any need for a school? Reliable sources tell us that there are 2 schools in the area which are undersubscribed.</td>
</tr>
<tr>
<td>The land is in the Green Belt with an agricultural value; 2 places with protected wild life species including deer, owls, water insects and snakes.</td>
</tr>
<tr>
<td>Normandy suffers from “sitting water” The bottom of my garden is very boggy and in the winter is full of water needing a fair deal of drainage. The proposed development lead is an even lower level.</td>
</tr>
<tr>
<td>Has a new medical practice been considered? Our existing one is very full and appointments difficult to get.</td>
</tr>
<tr>
<td>Both Westwood lane and Glaziers Lane are very narrow and traffic is reduced when buses, delivery trucks and cars are packed. The 2 railway bridges are also narrow and reduced to single lanes with heavy traffic.</td>
</tr>
<tr>
<td>Heavy traffic and buses have to both carriage ways when entering Glaziers lane at the junction with the A323 when coming from the Guildford direction – causing problems at peak times.</td>
</tr>
<tr>
<td>Subsidence and flooding has also been a problem on several occasions at that junction.</td>
</tr>
<tr>
<td>I agree with many, many other residents of this village that the infrastructure is not suitable for such a massive development in the Green Belt and encroaches on the Surrey Hills and conservation area there.</td>
</tr>
</tbody>
</table>

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp172/2459</th>
<th>Respondent: 10903009 / Ann Messer</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A46</td>
<td></td>
<td></td>
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</tbody>
</table>

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

| I am delighted that the above sites for a major development project have been removed from the local plans. |
| But I am concerned and strongly OBJECT to any future major developments in Guildford Road, the northern end of Glaziers Lane, Flexford, Walden cottages, and Palm House Nursery traveller site. |
| 1) The infrastructure in the above areas are totally inadequate for further major development and has been improved or added to. |
2) The roads are already very congested especially at peak times. Glaziers lane and Westwood lane are narrow country roads with partial pavements and dangerous road bridges for heavy vehicles. (I have been told that a new road and foot bridge at Ash station was (?) over 50 years ago).

3) The electricity supply is not entirely reliable.

4) The drainage is inadequate and suffered to flooding and sewage problems.

5) The medical practice is already fully stretched.

6) The village of Normandy is close to the Surrey Hills and the Surrey Heathland making a crucial break between Guildford and Aldershot. Any future development of so many extra homes would make it a continuous building link between the above and destroy the effect of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3062  Respondent: 10903009 / Ann Messer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Local plan consultation for sites A46 and A47

I am delighted that the above sites for a major development project have been removed from the Local Plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3063  Respondent: 10903009 / Ann Messer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A47

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Local plan consultation for sites A46 and A47

I am delighted that the above sites for a major development project have been removed from the Local Plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3064  Respondent: 10903009 / Ann Messer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A49

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

But I am concerned and strongly OBJECT to any future major developments in Guildford Road, the northern end of Glaziers Lane, Flexford, Walden Cottages, and Palm House Nursery Traveller site.

1. The infrastructure in ID1 in the above areas are totally inadequate for further major development and has [illegible word] been improved or added to.
2. The roads are already very congested especially at peak times. Glaziers Lane and Westwood Lane are narrow country roads with [illegible word] pavements and 2 dangerous road bridges for heavy vehicles. (I have been told that a new road and footbridge at Ash Station was mentioned over 50 years ago).
3. The electricity supply is not entirely reliable.
4. The drainage is inadequate and [illegible word] to flooding and sewage problems.
5. The medical practice is already fully stretched
6. The village of Normandy is close to the Surrey Hills and the [illegible word] Heathland making it a [illegible word] break between Guildford and Aldershot. Any future development of so many extra homes would make it a continuous building link between the above Towns and destroy the effect of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/144  Respondent: 10903073 / HEINE PLANNING (ALISON HEINE)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Having checked, I fail to see how the allocations for Gypsy Traveller sites would deliver 43 (minimum) pitches to meet need as stated at para 4.2.22 for the period 2012-2017. Perhaps this could be made clearer. I apologise if I have failed to understand how this has been calculated but as I see it Cobbetts Close is existing with 17 pitches. Policy only proposes 3 additional pitches on this site. This table for A48-57 implies 34 additional Gypsy Traveller pitches (NOT INCLUDING a51 FOR SHOWMEN) plus 3 at Cobbetts close ie 37 new pitches (assuming all others are new and not existing with no permanent consents). I am unclear how the identified need for 43 pitches will be met 2012-2017?

I am unclear where the required 5 year supply for sites will be come from as most of these site allocations appear to address an immediate (historic need) rather than address the need for 2017 onwards for when the plan is adopted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/141  Respondent: 10903073 / HEINE PLANNING (ALISON HEINE)  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A51

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Struggle to see how this can be shown as providing 20 new pitches when 17 are existing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/142  Respondent: 10903073 / HEINE PLANNING (ALISON HEINE)  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A52

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Strongly support but query why occupation should be restricted on a personal basis if land is removed from the Green Belt.

The existing need for pitches would be equally met if occupation was restricted to any Gypsy Traveller

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPS16/143  Respondent: 10903073 / HEINE PLANNING (ALISON HEINE)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Strongly support based on recent appeal decision
The family are well integrated into the local community
The site does not harm the setting of the conservation area
Highly sustainable site which could easily be removed from the Green Belt without compromising the boundary
Query however why LPA think there is a need to retain a personal condition if site is removed from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/254  Respondent: 10903073 / HEINE PLANNING (ALISON HEINE)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I support the policy with a few reservations
It is acknowledged that much work has gone into preparing this policy.
I support the inclusion of Gypsy- Traveller (GT) policy as part of Homes for All with fair and equal treatment as part of
general housing need.
I support the inclusion of site allocations for GTs
I support the recognition of need to provide choice of sites by size and tenure

I support the need to remove land from the Green Belt to meet need. I fail to see how else need can be met in this Borough. A similar approach was agreed as part of the Solihull EIP/Local Plan.

I support the inclusion of sites as part of housing allocations but do not like reference to ‘whilst there remains an identified need’. It is far from clear how policy will be relied on to deliver and when. It is not clear as to phasing and when permissions will be granted. I worry developers will seek to argue the need no longer exists. I worry sites will not come forward quickly enough to meet immediate need and need post 2017. Greater clarity would be welcome. The minimum figure of 500 homes is a high threshold. There would appear to be few sites where provision will be made. I wonder whether the threshold needs to be lowered to 250 or 300 to provide gt choice and certainty sites will be delivered.

4.2.21- I am unclear where the suggested limit of 9 pitches/plots or less comes from. That seems a bit prescriptive. Gov policy (not longer saved) suggested 15 pitches or less was an ideal limit. Two site allocations are for sites with more than 9 plots/ pitches. I think this is a matter best left to site specific issues. This should not be used to thwart applications for larger sites where appropriate.

4.2.22- GTAA 2012 is dated. Need should be expressed as a minimum figure not a ceiling limit. Need for 43 pitches should make clear it is for period 2012-2017 and for 30 pitches post 2017.

It is not accepted that the immediate need to 2017 is met. The site at Cobbetts Close is existing with 17 pitches. It is proposed to extend this to 20 pitches adding 3 not 20 pitches. By my calculations policy as submitted will deliver only 37 new pitches 2012-2017 if the plan is adopted, not 43 (ie 3 at Cobbetts and 34 on 8 other sites not including A50 for showmen). (note: I apologise if I am referring to old data but can not risk going back and checking policy again as last time I did this I lost all my comments as there seems to be no mechanism to save comments). For this reason I fail to see how policy is sound and legally compliant. It does not appear to deliver enough sites to meet identified need in accordance with PPTS/ NPPF. If I am wrong then no issue is taken with soundness and compliance.

4.2.23 There is a pressing and urgent need for more transit provision. The GTAA is not the obvious mechanism to assess this. Post Sept 2015 and change to PPTS GT definition all lpas should include provision for GTs or they will not be able to travel for work. Government policy now requires GTs to travel in order to be settled. All councils should make provision for Transit sites if GTs are to be able to comply with the new definition. Provision of transit sites must be a priority.

4.2.24- support allocations as part of larger housing schemes but unclear how this will be delivered.

I do not see why sites removed from the Green Belt should be restricted by personal conditions.

I strongly support allocations A52 and A57 and would want to be informed if there is any intention to delete or remove them from the submitted plan. Both sites are occupied by families I have assisted with applications and appeals and have genuine need to be settled in this area. If this were to happen by way of any modification I would want to exercise the right to attend the EIP on behalf of the occupiers of these two sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the proposals being put forward in the latest draft local plan. Since the last Draft Local Plan of 2014 the GBC has managed to change every major site in Send. Originally in 2014 the plan proposed for 430 houses to be built in Send. In April 2016 this went down to 185 but now has just gone up to 485, 7000sq m of industrial warehousing and a massive new road junction at Burnt Common onto the A3!

I understand that GBC cannot make these significant changes without going through another full consultation under Regulation 18 and not as you are trying to do and short cut the system. Does this not invalidate the whole process?

I also understand that the GBC’s transport assessment was not available to councillors when the vote was taken in May this year. Obviously it wasn’t an important enough issue for you before the vote was taken!? 

1. I object to Send Village being removed from the Green Belt. With the proposed development of 2000 homes at Gosden Hill Farm, Merrow -Policy A25 there will be wholesale destruction of the Green Belt in this area. Which is in clear contravention of the central government's stated commitment to the protection of the Green Belt. Send acts as an essential buffer between Woking and Guildford and stops it becoming one large conurbation. NPPG83 states that the Green Belt should only be altered in ‘exceptional circumstances'. There are no exceptional circumstances in Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4228  Respondent: 10903265 / M Stokes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A42-Clockburn Nursery, Tannery Lane, Send.

As a regular walker along this lane I wish to point out how dangerous the junction onto the A247 is. There is limited vision when turning either right or left due to resident's parked cars along Send Road. Tannery Lane itself is narrow and at times there is only room for one vehicle at a time at the junction to Send Road due to residents cars parked outside their houses. The lane itself becomes a single track lane and is far too narrow for it to take any more traffic along it. There is already planning permission granted for 64 apartments at The Tannery and for building a Marina. With the added addition of the proposed 45 houses this stretch of road would become very hazardous and dangerous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
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<tr>
<th>Comment ID: PSLPS16/4223</th>
<th>Respondent: 10903265 / M Stokes</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I Object to Policy A43-Land at Garlick's Arch, Send Marsh/Burnt Common and Ripley.</td>
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<tr>
<td>It is proposed that 400 houses and 7000sq. m of industrial warehousing are built on this site. This site is NEW, was not included in Regulation 18 draft and has not been consulted upon previously. The site in question is within the Green Belt and includes ancient woodland with tree preservation orders in place. With regards to the warehousing why do we need this here in Send? Since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in floor space from the previous draft plan is there really a need for 7000 sq. m of industrial units here?</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>1. I object to Policy A43- A3 Interchange at Send Marsh/Hurnt Common. The A247 is already a highly congested road during the peak times with the extra traffic from 400 new homes and warehousing the area will be permanently gridlocked! Added to this the proposed 2000 homes at Gosden Hill and 2000 houses at Wisley Airfield most of the traffic to and fro to the A3, M25. Woking, and Guildford would go through Send. As the A247 is already overloaded noise and pollution levels already at excessive levels would worsen. The A247 cannot be improved due to the nature of this residential road and narrow bridges crossing the Wey and Arun canal and the River Wey. Added to this most of the roads, which join onto the A247, are residential single-track lanes. So where is all the extra traffic supposed to go?</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy a -Land west of Winds Ridge and Send Hill, Send.

The proposal to build 40 houses and two travellers' pitches here is new and was not included in the Regulation 18 draft and has not been consulted on previously. The development is inappropriate due to its permanent Green Belt Status and also the site contains documented unsafe landfill waste, which is currently vented. It is also an inappropriate location due to the fact it is a narrow width single access country lane particularly at its junction with Potters Lane. It has a narrow access onto the bend with very limited vision for turning either right or left and is extremely dangerous. Potters Lane itself is narrow and again this lane in places is single track.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/0073  Respondent: 10903265 / M Stokes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In summary; The local infrastructure in Send... Our schools are already oversubscribed; our doctor's surgery is extremely busy (it can take up to 3 weeks to see your preferred doctor), limited local shops. There is very limited public transport; our roads are already heavily congested, pollution levels are increasing.

Whilst I appreciate there is a need for housing within the borough. Send village has had a number of new houses built recently; currently 23 homes are being built at the old Vision Engineering site, Send Road.

If the population within the borough is to grow by around 20,000 within the plan period we will not need the proposed 13,000 odd houses proposed by GBC in the Local Plan. If you work on the basis of 2.4 persons per home around 8000 houses would be needed. Could not a large percentage of these houses be built on brownfield sites? Perhaps it is because GBC/Developers don’t like brownfield sites, as it is easier/cheaper to build on the Green Belt. No industrial waste to clear away!

I personally feel that the excessive amount of new housing and warehousing, which has been proposed for our village is untenable. I ask that my comments are shown to the Planning Inspector and receive confirmation of receipt of my letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/472  Respondent: 10903265 / M Stokes  Agent:
<table>
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<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send Marsh/ Burnt Common</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I am not sure where the GBC is going with this plan but I find it completely unacceptable and strongly object to the proposals as it stands. Whilst I understand there is a need for future housing within the villages the proposed numbers is excessive and I object to the unfair imbalance of the Plan. With the removal and reduction in other parts of the borough the Plan has become even more biased against the North East of the borough. It would seem that because of our villages proximity to the M25 and A3 of the proposed 11350 homes in the Plan, 40.6% are within 3 miles of Send Marsh, most of which are on the Green Belt. This is grossly unfair on an already overcrowded part of the borough.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: pslp172/3565  Respondent: 10903265 / M Stokes  Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

In the the original draft plan 45 homes were on the plan now it has increased to 60! The road junction with Tannery Lane and the A247 is very narrow the visibility for turning out of this junction is restricted by parked vehicles along the main road and the lane itself by residents and shoppers.

Tannery Lane itself by its name is only passable as a single-track lane with passing places; it will not be able to sustain the increased traffic arising from the extra homes suggested. I regularly walk this route and have seen first hand the problems of vehicles trying to turn out of the lane onto the main road. It would seem you have completely ignored the views of all the local objectors in this matter.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</table>
You have managed to completely ignore all the previous objections to this development and have increased the houses from 400 to 600 and added 6 traveling show people plots.

The excessive amount of traffic that will be generated from this site will cause immense congestion on already congested roads and lanes in Send and Ripley. Please note whenever there is a problem on the A3, Send and Ripley become gridlocked add in 600 extra homes and we wont be going anywhere!

Our schools are already oversubscribed we only have one doctors surgery which is already under pressure to support the local villages of Ripley, Send and W Clandon.

The site is within the Green Belt along with an ancient woodland and no exceptional circumstances exist. If this development is allowed to go ahead it will join up Ripley and Send defeating the key purpose of the Green Belt.

Why is there a need for 6 traveling show people plots? There is no proven demand for such sites in this location.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

There is now a new allocation for a minimum of 7000 sq.m of industrial or warehousing:- This was deleted from the original plan but has now found its way back in and the wording has changed to a **minimum** from the previous wording to **maximum**. We already have industrial units in Tannery Lane, which stand empty.

The office block on the A247 in the village couldn’t be let and was refurbished into flats and now sold. Slyfield and Guildford have many empty industrial units and empty sites available. I cannot see why it is necessary to build a large industrial site in a village location in a Green Belt area.

When the 2017 Employment Land Need Assessment shows a reduction in demand for the whole borough. Yet you plan a huge allocation in Send in the Green Belt. Why?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<th>Comment ID: PSLPA16/1938</th>
<th>Respondent: 10903617 / Judith Moseley</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also strongly object to amount of traveller and traveling show people sites, which has been allocated to both Send and Ripley, a total of 12 pitches. Section 4.2.22 of the Plan states that “Sufficient sites are identified within the Local Plan [for] 8 plots for Traveling Showpeople.” So why do 75% of them have to be within our villages?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPA16/1957</th>
<th>Respondent: 10903681 / Linda Freeland</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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As a resident of West Horsley I have taken great interest in the proposed developments outlined in the Guildford Submission Local Plan. After careful consideration I wish to make the following objections.

Firstly, the roads in the surrounding area are, at present, not fit for purpose. They require an enormous amount of investment to even bring them up to a reasonable condition for the present traffic but the amount of people and vehicles which the plan would bring to the area would result in further deterioration and in places, particularly during rush hours, complete gridlock. The prime example of this is the junction at the end of East Lane, Ockham Road and the Drift.

Secondly, the area A39 is to be built on land which allows houses at present in the area, to be free of standing water during inclement weather. Whilst I am hopeful that future planners would be aware of that, will it be taken into account? Experience tells me not to assume! The proposed development would be affected badly without doubt.

Lastly, I have grandchildren who also live in the area and attend local schools. Knowing the state of the system at present, where will the "new" schools for the "new" pupils be built because schools locally are up to capacity, or are the planners intending to use other schools not within the district to take the overflow? The resultant traffic from the movement of these children will add to the problem hugely.

The doctors surgery will be overwhelmed, the local shops unsupported as there will be no parking and I could go on. The general lack of common sense and thought about the people of the area is staggering. I hope some good sense will prevail and the plan will be completely revised.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing in protest to the Local Plan as this relates to the villages of Send and Send Marsh because it seems to take no account of the wishes of local residents, many of whom, including my family, will be adversely affected. Here are just some of the issues:

- Rush hour traffic is already at a standstill throughout Send, Send Marsh and Burnt Common and an extra 490 plus homes will add massively to this problem.
- Building on the green belt was supposed to be a last resort rather than something taken for granted - 90% of residents were against this in previous local polls.
- Schools are already struggling to find places, and the Villages medical centre appointments are already at capacity.
- Air pollution will become a serious problem affecting the health of all local residents, especially young children.
- Why does there have to be so many houses in such a small area when many other villages are getting off with almost no additional development.
- Our green belt environment is home to many different species of wildlife, all of them under threat if this housing goes ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp173/99  Respondent: 10904833 / Elaine Roberts-Toomey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy 2 at paragraph 4.3.15 to inset Send business park from green belt because its inappropriate development in an area with very poor access, the most narrow and restrictive road in the area and if you see the impact a single box van causes from either direction never mind a juggernaut then you will realise the futility of this application, its an area of outstanding natural beauty, and is also an old non conforming user in an area it should never have been developed in.

Finally, I cannot believe I voted for you. Your lack of support for locals makes your positions on the local council untenable. Please resign your position, as come the next election I will be voting for any one but you guys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1149  Respondent: 10904833 / Elaine Roberts-Toomey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A42 Clockbarn nursery tannery lane because the increase to 60 homes as even 45 homes would bring far too much traffic to a road that is nearly impossible to exit on to the main road. Assuming 2 cars per home, this would bring 120 cars which would bring grid lock to central Send.

This increase completely ignores all previous objections.

The locality is already subject to local flooding - which will be made worse, which the developers will get away with, the local council will ignore and the local residents have to put up with yet again.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1150  Respondent: 10904833 / Elaine Roberts-Toomey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A43 Garlicks Arch Send Marsh because this increase completely ignores all previous objections, the traffic is already terrible up to the shell roundabout at to the junction opposite garlicks arch at send march road, it will gridlock traffic all through send and back to old woking. [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]. Green belt should always be protected, this is a travesty that our children and grandchildren will blame you all for, Ripley and send will no longer be villages but a town we might as well rename as RIPSENDOFFLY which if approver is what you have done, who would want to buy a home on land with polluted land (lead shot) lets see you and the developer cover that one up to purchasers, ancient wood land and frequent flooding which will be made much worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1151  Respondent: 10904833 / Elaine Roberts-Toomey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A58 Burnt Common because you have included the wording 'minimum' guess you hoped we would not notice, the extra local traffic would make exiting the A3 unsafe and not somewhere your would want to base a business, there is actually no demand for new industrial land as plenty is available at Slyfields which has better access. Again this is in the middle of greenbelt, you are ignoring thousands of previous objections from 2014.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1910  Respondent: 10904865 / Michael W.R. Herwig  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the building of any industrial units on Garlick's Arch farmland especially as there is a 40 ha. site at Slyfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1911  Respondent: 10904865 / Michael W.R. Herwig  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the building of a new junction for the A3 at Burnt Common. I have seen the traffic in the area increase in volume drawn by the magnet of the A3 and M25. They have been drawn like flies into the net of the A3, M25 congestion and I am astonished that Guildford Council don't realise that the whole Send area will seize as frustrated drivers scurry about, very slowly of course, in their attempt to get to the A3 and M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4122  Respondent: 10904865 / Michael W.R. Herwig  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, as a disabled driver with frequent need to attend the surgery in Send Road, that I will be trapped and unable to meet appointment times. I already have to avoid early morning/late afternoon times due to congestion on Send Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4120  Respondent: 10904865 / Michael W.R. Herwig  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposals to build on Green Belt in the Guildford Borough Council area.
I OBJECT to the scale of building on the Green Belt in the Send, Send Marsh and Burnt Common area.
I OBJECT to the lack of evidence to support such large scale building.
I OBJECT to Guildford Council's belief that it is "progress" to convert all our Green Belt to concrete and tarmac just to satisfy some badly researched need for extra housing and industry.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4124  Respondent: 10904865 / Michael W.R. Herwig  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Think again Guildford. You don't seem to be aware of what happens in the Send area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1068  Respondent: 10905185 / D White  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the manner in which Guildford Borough Council has presented this latest plan. I consider the plan is misleading and contradictory to other documents presented by Guildford B.C. especially the Summer edition of "About Guildford" where statements are made and then immediately contradicted.

For example:-

You state that the number of development sites has been reduced. YET you added more sites at short notice, Garlick’s Arch and Winds Ridge/ Send Hill AND ENLARGED the Send inset area, thereby allowing and encouraging larger developments.

You state that there will be NO development along the A3 between Junction 10, M25 to the Hogs Back. YET YOU PROPOSE (including Wisley Airfield) some 6800 dwellings.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the removal of 89 ha of Green Belt at Gosden Hill Farm. This valuable farmland is desperately needed to help reduce the need for imported fresh foodstuffs. Despite the suggested road improvements the development proposal will, without doubt, have a detrimental effect on the existing areas of Burpham and Merrow. The "Allocation" box in Policy statement A25 clearly shows, without any doubt, how Guildford Borough Council supports the environmental Armageddon of this *part* of the Borough. Adding together all the proposed uses, it is absolutely obvious that the Burpham area will be a place to avoid. Congestion caused by housing, schools, shopping, general employment, Park and Ride and other proposals will add to the traffic nightmare current on the A3.

To put it simply, wasn't the A3 improved to REMOVE traffic from peripheral villages?

Perhaps you have forgotten!

Finally, perhaps you will be able to explain to the Public Inquiry Inspector why Guildford Borough Council is encouraging developers to progress housing proposals as soon as possible. Could it be that Guildford Borough Council is attempting a series of "fait accompli" in advance of any Inspector's decision?

Please ensure this letter of Objection is presented to the Public Inquiry Inspector.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Wisley Airfield still being included in the Plan when permission was refused in April.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1693  Respondent: 10905185 / D White  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the industrial use at Garlick's Arch when studies have shown a reduction in the need. Why put this development in the Green Belt when there are 40 ha. available at Slyfield?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1694  Respondent: 10905185 / D White  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the development at Clockbarn Nursery. Tannery Lane is narrow, winding and already suffers heavy vehicle movements for the industrial units. The proposed 45 houses, together with the 65 houses already approved, will create a traffic nightmare at the junction of Tannery Lane and Send Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1695  Respondent: 10905185 / D White  Agent:
I OBJECT to the disproportionate and detrimental amount of building proposals for the Send, Send Marsh and Burnt Common area. It seems that the area is required to surrender some 38 has. of Green Belt to satisfy the financial rewards of land owners and developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1692  Respondent: 10905185 / D White  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the disproportionate and detrimental amount of building proposals for the Send, Send Marsh and Burnt Common area. It seems that the area is required to surrender some 38 has. of Green Belt to satisfy the financial rewards of land owners and developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1695  Respondent: 10905185 / D White  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the destruction of Green Belt at Burnt Common in order to create a further junction for the A3. This proposal will massively increase the traffic along the A247 through both West Clandon and Send. The A247 was never designed to attract large volumes of traffic and is incapable of improvement without substantial compulsory purchase of land and property. I BELIEVE THAT THE LAND HAS BEEN OFFERED BY THE OWNERS OF THE GARLICK ARCH LAND AS A MEANS OF PERSUADING GUILDFORD COUNCIL TO GRANT PERMISSION FOR THE 400 HOUSES AND INDUSTRIAL DEVELOPMENT. You will be feeding the already seized up A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the housing proposal at Send Hill/Winds Ridge. The Plan acknowledges former quarry workings but makes no mention of the land being contaminated by landfill. Neither does it refer to the venting of the land to dispel underground gases.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3694  Respondent: 10905185 / D White  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the complete lack of any infrastructure proposal to support the increase in housing. The local schools in Send and Ripley are over capacity and were, in 2014, when the previous Plan was promoted. There is only one doctor's surgery which covers the Send and Ripley areas. It was at capacity in 2014, and still is.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3682  Respondent: 10905185 / D White  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the destruction of ANY part of the Green Belt when a sustainable requirement has not been proven AND NONE HAS.

I OBJECT to the removal of some 128 ha of Green Belt in the areas of Send, Send Marsh, Burnt Common and Gosden Hill Farm and its conversion to concrete and tarmac.

I OBJECT to the insetting of the Send area which removes some 39 ha from the Green Belt. By this action Guildford B.C. is promoting and encouraging residential and industrial development in an area where perceived need has NOT been proven.

I OBJECT to Guildford Council's double standards when in "About Guildford" you state the Plan rejects any schemes that would have a detrimental effect on the Green Belt. You do not appear to understand your own evidence and publicity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<tr>
<th>Comment ID: PSLPA16/1030</th>
<th>Respondent: 10905825 / Bridgette Hampton</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to new sites (Garlicks Arch) being introduced as an after thought when it was not even considered in the previous plan. A slip road on the A3 at Burnt Common has been added to the Draft Local Plan without Highways England consent.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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I object to a totally unrealistic number of houses for the country lanes to absorb.
I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?
 Attached documents:

| Comment ID: PSLPP16/3398 | Respondent: 10905825 / Bridgette Hampton | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

I object to the removal of villages from the Green Belt.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?
 Attached documents:

| Comment ID: PSLPP16/3397 | Respondent: 10905825 / Bridgette Hampton | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.
I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently out side their financial capability.
The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13984  Respondent: 10906081 / TK and AM Williams  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Also, I strongly oppose the GBC plans to propose a major housing building programme in both East/West Horsley and on the old Ripley Airfield. I find the whole scheme totally abhorrent. My reasons are as follows:-

1 The local infrastructure is already overloaded and up to its limits. The schools are full. The medical services at Horsley Medical Centre are stretched to capacity and the drainage on the roads cannot cope. As it is; the roads flood with heavy rain.

2 The local railway stations will not be able to cope with approx an extra 1500 persons. The rush hour trains are already full and there will be insufficient car parking space. There certainly is no adequate bus service in the area.

3 The proposals to build what amounts to another Surrey village on Ripley Airfield is ridiculous. 2100 new houses means at least 4000 cars.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13981  Respondent: 10906081 / TK and AM Williams  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I strongly object to the Guildford Borough Council plans to inset East/West Horsley from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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1. I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough; this is more than double the figure of 322 used in previous plans. The way students, so-called “economic need” (already questionable and now more questionable than ever post-Brexit) and affordability are calculated inflates the housing need.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.
But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is unacceptable for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/4265  **Respondent:** 10906145 / Joe Gervasio  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **I object to Gosden Hill development (A25)**

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF.

This Green Belt site prevents the sprawl of Guildford town, and together with other Green Belt sites in the plan, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight an historic village.

The development would generate in the region of 4,000 vehicles which will naturally use the A3 which is already stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and also through Send and Ripley which are also severely constrained.

The remaining agricultural land between Gosden Hill and West Clandon would be so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon, Send, Ripley and Wisley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/4268  **Respondent:** 10906145 / Joe Gervasio  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to building 45 houses at Clockbarn, Send.

I object to this because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more vehicle movements.

I wish these objections to be fully and individually taken into consideration. Please acknowledge receipt and confirm that they will be placed before the Planning Inspectorate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4263  Respondent: 10906145 / Joe Gervasio  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

I object to the development at Garlick’s Arch. It was sprung on the village at the last moment with only 2 weeks’ notice and without any prior consultation and is not required in terms of housing need either for the village or the Borough. Garlick’s Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for it’s removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance.

The Plan states the preference is to use previously developed land, but in this draft GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch, which is part of the permanent Green Belt.

The site is not appropriate because:

- There is no sustainable transport infrastructure.
- The site is liable to frequent flooding.
- The site has a particular conservation sensitivity since it is covered in ancient woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.
- It is a wildlife habitat, but no wildlife report for the site is in the Local Plan.
- There are no plans to improve local schools, medical or utilities to cope.

Moreover, this site was included at the last minute with no section 18 consultation with the local community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4266  Respondent: 10906145 / Joe Gervasio  Agent:
1. I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

There is no need for new industrial sites at Garlick’s Arch (A43). It is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space (which is highly doubtful) it should be at Slyfield where there is a 40ha site available.

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4264  Respondent: 10906145 / Joe Gervasio  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

1. I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

North facing ramps to the A3 at Burnt Common would be a disaster for local communities, which do need to access the A3 to the north, but the addition would draw in a huge amount of ‘through’ traffic. E.g. all traffic from London/M25 to Woking would go through Burnt Common, Send and Old Woking. This would result in the A247 (Send Road) being gridlocked most of the time.

This is not sustainable as this road cannot be improved, and the fact that there is no concrete proposal in the Local Plan to do so is further evidence of this.

Furthermore, I object to this proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the development of 40 houses at Send Hill

This is a high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9146  Respondent: 10906145 / Joe Gervasio  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

1. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

As any view of the area from the air will tell you, the Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

This area is an attractive area and forms part of one of the Borough’s most valuable assets – open green space. It should not be destroyed because a property developer is prepared to “gift” some land for a slip road.

The council often complains that a significant proportion of the Borough is Green Belt. But this is a Good Thing! We should be grateful for it, appreciative of it, and protective towards it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9141  Respondent: 10906145 / Joe Gervasio  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

There is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that.

The rural roads in this area are narrow, in poor condition and have no footpaths. The scale of the proposed developments in this area means dangerous and unsustainable traffic levels. Many of the roads in this area are in poor condition and the proposed increase in traffic will lead to more danger for all road users, many of whom have no choice but to use these roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9148  Respondent: 10906145 / Joe Gervasio  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the lack of proper infrastructure planning for sites (Policy I1)

The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9149  Respondent: 10906145 / Joe Gervasio  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2
1. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

The A3 and M25 are already severely congested, and would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9144  Respondent: 10906145 / Joe Gervasio  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the Plan because of concerns about poor air quality (Policy I3)

I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly close to the A3, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9139  Respondent: 10906145 / Joe Gervasio  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).

I object on these grounds:-

1. **I object to not protecting the Green Belt (Policy P2)**

I object to removing Ripley Send and Horsley from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl.

These villages and their countryside provides a necessary buffer between Woking and Guildford. The Green Belt is not some irritating bit of officialdom to worked around by planners. It is for the prevention of merging of towns and settlements which would otherwise create unrestricted sprawl. If these villages were removed from the Green Belt in time there would be continuous development between Woking and Guildford.

70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/9142  **Respondent:** 10906145 / Joe Gervasio  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. **I object to development in areas which are at risk of flooding (Policy P4)**

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river (meaning that it has a 1 in 100 or greater chance of flooding each year – this is the highest risk category). Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 (meaning having between a 1% and 0.1% annual probability of river flooding); that is, one tenth of the probability assessed by the Environment Agency!

This site often floods during the winter months and has flooded as recently as this summer 2016. Clearly the Council’s SFRA is not fit for purpose and so invalidates the local plan for such sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/9140  **Respondent:** 10906145 / Joe Gervasio  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)</td>
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</table>
13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses and there is no prospect of adequate infrastructure for them. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Local Plan has nothing to improve the infrastructure for Garlick’s Arch.

The development should be in urban areas where there is sustainable transport, and the genuine need can be met in on brownfield sites close to transport hubs.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp173/774</th>
<th>Respondent: 10906145 / Joe Gervasio</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>1. I object to the Borough Wide Strategy (Policy S2)</td>
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</table>
GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [site A35], Ripley/Send [site A43] and Gosden Hill/Clandon [site A25]). 36% of all the Plan’s new housing is proposed in these three wards, which have only 11% of the existing housing – this is disproportionate by over 300%

Over 5000 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the unfair imbalance of the Plan across the borough.

With the removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan has become even more biased against the North East of the borough. Guildford Borough is over 100 square miles. Of the 11350 homes proposed in the Plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

I object removing Send Business Park from the Green Belt (4.3.15).

Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5415  Respondent: 10906145 / Joe Gervasio  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removal of Brownfield sites (A4) from the Plan

Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the increase in housing proposed in Tannery Lane (site A42)

This has been increased by a third since the 2016 version of the Plan. This will have a significant impact on the already highly congested local rural road network around Send. This is in contradiction to section 2.14a of the Plan which states “Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays.” And yet there is no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/842  Respondent: 10906145 / Joe Gervasio  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the extended development in the Green Belt (Policy P2, Site A43)

I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

I object to the allocation of 6 Traveling Showpeople sites in A34 Garlick’s Arch

The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlicks Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.

I object to the hiding of development by “deferment” (A24, A25, A26, A43)

This version of the Plan has concealed some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects,

1. i) to hide the number of housed actually being built (A24, A25, A26 – total of 1100 deferred, but still being built!), and
2. ii) give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.

I object to the potential and ill-defined increase in housing allocation at A43 Garlick’s Arch
The potential of an increase from 400 houses at site A43 Garlicks Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages.

**The inclusion of site A58 Burt Common, removes the need for A43 Garlick’s Arch**

GBC’s own reasons for including Garlick’s Arch A43 in the 2016 version were

1. a) *The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm, ... (site allocation A25) [ than the Burnt Common site did ]”*
2. b) *The site [A43] provides the employment floorspace needed in the plan to help meet identified needs”*

Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (which are almost contiguous) are in the plan; therefore GBC are not following their own guidelines and objectives.

Since A58 Burnt Common is now in the Plan (2017) more than the “required” industrial space is available there, so there is no reason for Garlick’s Arch to be included.

I object to the lack of proper infrastructure planning for sites (A43 and A42)

The Foreword to the plan by Paul Spooner includes on page 5:

"We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan”.

There lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/5416  **Respondent:** 10906145 / Joe Gervasio  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to removal of Brownfield site (A34) from the Plan

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
The Plan is self-inconsistent in respect of traveller sites.

A50 Whittles Drive, Normandy, shows on the Site details: “Allocation: The site is allocated for approximately 14 Travelling Showpeople plots ...” Clearly A50 more than covers the total “need” of 8, page 40, 4.2.22. and so no “need” exists for this in site A43. This and other inconsistencies in the Plan mean no decision can be made on the basis of this document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the proposal for a Waste Management Facility in Green Belt (A58)

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that

“Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says:

“Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That section has now been removed, thereby accepting that needing to make greater than normal profit is to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7994  Respondent: 10910273 / Lynda M Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to strongly OBJECT to the Guildford Borough Council Proposed Submission Local Plan 2016.

I thoroughly endorse the submissions set out in the East Horsley Parish Council Response dated 13th June 2016 (attached) and their letter of 4th July 2016, setting out detailed additional comments on Site Policy A35, ‘land at former Wisley Airfield, Ockham’ (also attached).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  EHPCLocal Plan Response 13.06.16.pdf (278 KB)  EHPCLetter re Wisley development 4July2016.pdf (3.5 MB)

Comment ID: PSLPP16/18142  Respondent: 10910273 / Lynda M Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/18144  Respondent: 10910273 / Lynda M Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/18147  Respondent: 10910273 / Lynda M Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

East Horsley contains a wide range of heritage assets which make an important contribution to the look and feel of the village and its character. We fully support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/18150  Respondent: 10910273 / Lynda M Williams  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We support this design policy, although not the proposal of Policy P2 to inset East Horsley from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/18131  Respondent: 10910273 / Lynda M Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We support the general policy statements made in this policy, whilst having no opinion on the scale of the new office space and industrial land area being proposed by GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/18137  Respondent: 10910273 / Lynda M Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Under this policy, areas within 500 meters of a "public transport interchange" play a key role.

Proposals for new office and research and development floorspace are to be directed to firstly Guildford town centre and then to areas within 500 meters of a public transport interchange ("PTI").

East Horsley has two railway stations, Horsley Station and Effingham Junction Station, but currently the draft Local Plan only proposes that Horsley Station should have PTI status.
The explanation given at 4.4.17 for Effingham Junction Station ("EJS") not enjoying this status is that either it is located within the Green Belt, or it is within an AONB or it is isolated away from the village or centre. It is not clear which of these applies to this particular station, but we believe strongly that none apply and that there is a strong case for EJS deserving PTI status in the same way as Horsley Station.

We will deal firstly with the three alternative reasons given for EJS not supposedly qualifying as a PTI.

Firstly there is the Green Belt aspect. This is not logical since if location within the Green Belt were determinative, this would mean that Horsley Station would also fail to gain PTI status.

Also the draft Local Plan proposes elsewhere at Policy P2 that the whole of East Horsley, including both Horsley Station and EJS, should be inset from the Green Belt. It will be seen elsewhere in these comments that EHPC objects strongly to this proposal, but the point remains that if location within the Green Belt were a valid reason for not being given PTI status, the Local Plan itself makes it clear that under Policy P2 this will not apply in the case of both Horsley Station and EJS.

Secondly EJS is not located in an AONB. EJS is within the envelope of the village settlement and will remain as such under the draft Local Plan.

Thirdly EJS is not "isolated" or "away from the village centre."

Effingham Junction (the area immediately south and west of EJS, served by respectively Forest Road south of the railway bridge and Old Lane) may not have the extensive shopping parades enjoyed by East Horsley's two other centres (Station Parade and Bishopsmead Parade) but it is a thriving community with a significant population and also a significant number of active and successful employment floorspaces and sites.

These include in Forest Road a general store (Forest Road General Store), a car sales and car repair business (PJB Car Sales/The Body Shop), a dental health centre and chiropractic clinic (Mortiboys) and on Horsley Road, Cedar Garden Centre, Royce Turf and Irrigation and at the Newmarsh Farm site, a number of businesses including Richmonds Horse Transport, Braye Hydraulic Repairs and TTS Surfacing Ltd.

It is therefore vital that the Local Plan's economy policies affecting the area protect these spaces and sites and create conditions for their sustainable growth and hence job creation.

Since all or most of these businesses are located within 500 meters of EJS, Policy E2 would be an invaluable driver for such growth which could play a major role in ensuring that Effingham Junction maintained and enhanced its position as East Horsley's "third centre" for homes and jobs. On the other hand, to exclude EJS from PTI status could very well stifle its sustainable development and condemn it to a future as a dormitory "backwater" of East Horsley.

It is also counter-intuitive in the extreme to refuse EJS "PTI" status. This is for the simple reason that EJS is clearly a "public transport interchange" as that term would be normally understood. This is for the following reasons:

1. as the name "Effingham Junction" indicates, EJS is at an important junction and The railway line from Guildford splits here into two lines which take different routes into London, so many London-bound passengers will change trains here;
2. EJS serves not only the Effingham Junction area, but also the many residents of Effingham and Little Bookham for whom EJS is far closer than Bookham Station;
3. EJS also serves the many residents of Cobham area for whom EJS is far closer than Cobham and Stoke d'Abernon station EJS also serves the residents of Ockham and Ripley;
4. EJS also serves the considerable numbers who visit local leisure activity sites, including three paintball sites and two clay pigeon shooting sites, for whom EJS is the only viable public transport hub; and
5. EJS will be the nearest railway station to the land at the former Wisley Airfield site which is proposed for the building of 2000 homes under Policy A35 of the draft Local Plan and if, despite the objections of many including East Horsley Parish Council, this proceeds, then significant numbers of residents will be taking one form of travel to EJS and then interchanging onto the railway.

EHPC accordingly OBJECTS to Policy E2 insofar as it fails to confer "public transport interchange" status on Effingham Junction Station.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/18139</th>
<th>Respondent: 10910273 / Lynda M Williams</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We support this policy, including the designation of Station Parade, East Horsley, as a District Centre under the draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We support this policy, including the designation of Bishopsmead Parade, East Horsley, as a rural Local Centre under the draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/18114</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
We support the general policy statements made in this policy, which are mostly repeating NPPF policies. Our main concerns, as set out previously, are primarily with the scale of new housing being proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We support the general principle that developers should be required to contribute part of their development profit towards the cost of social housing in the borough. However, this ‘one-size-fits-all’ policy is seriously flawed and likely to prove highly inefficient, if not unworkable, in the longer term.

In this policy GBC have taken no regard whatsoever of the differences in affordable housing need across the borough. This has significant consequences in East Horsley, which is the area with the lowest demand for affordable housing in the borough. Moreover, East Horsley is not classified as a ‘rural area’ under the 1997 Housing Order and therefore is not exempt from the new ‘right to acquire or enfranchise’ entitlement – a factor which is likely to see affordable houses in the parish being bought up as soon as possible and thereafter lost to the affordable sector.

Under Policy H2, 40% of all but the smallest development sites in East Horsley will be required to have affordable housing built upon them, irrespective of whether there is actually demand for more social housing in that area. Moreover, the affordable housing targets proposed in the Proposed Submission Local Plan indicate that the biggest component of affordable housing (40%) should be built as 1-bed dwellings despite the fact that GBC’s own studies show that the strongest affordable demand in the borough is actually for larger 3-bed dwellings.

As a result of this flawed affordable housing policy, a significant volume of social housing is likely to be built in places where it is not needed and offered to tenants who do not want to live there nor have jobs near that location.

Policy H2 thereby fails the test of sustainability and should be radically revised. If not, the outcome will be serious inefficiency in the provision of social housing in the borough in an area such as East Horsley this is likely to be manifested in a rapid buying-up of properties for quick re-sale at a generous profit, at which point these homes also become lost to the affordable sector.

EHPC accordingly OBJECTS to Policy H2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPP16/18116</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/18117</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Surrey Hills AONB is one of the great treasures of Guildford Borough and we believe that protecting this area should be given the highest priority.

We therefore support Policy P1.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPP16/18121</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Local Plan Policy P2 states that: *We will continue to protect the Metropolitan Green Belt.* We fully and un-equivocally support this policy.

Unfortunately, despite such brave words, GBC appears to be in breach of this policy itself through the housing policies that it has set out in the Local Plan. The analysis included in the Appendix shows that around 65% of the developments proposed in the Proposed Submission Local Plan are to be built on land currently within the Metropolitan Green Belt. We consider this outcome to be outrageous.

Under NPPF rules, GBC is permitted to make allowance for factors which may constrain the delivery of new housing, such as the need to protect the Metropolitan Green Belt or the restrictions required to protect the Surrey Hills Area of Outstanding Natural Beauty (‘AONB’) which is offered protection under the NPPF comparable to that of a national park. Although these areas make up a large proportion of the land area of Guildford Borough, GBC makes no attempt to reduce its housing delivery in order to take account of such constraints. We find this approach inexplicable.

There are also a number of further issues relating to the detailed implementation of this policy which are set out further below:

**a) Paragraph 4.3.13: Proposal to inset East Horsley from the Green Belt**

Policy P2 proposes that East Horsley should be inset from the Green Belt, instead of being ‘washed over’ as it is today. Currently development is permitted within the settlement boundary, although this area is still considered to be Green Belt with a particular planning regime being applicable.

East Horsley is set in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving that character. Moreover, being ‘washed over’ by the Green Belt has not been a serious constraint on development within the village. For example, GBC’s planning records indicate that no less than 149 net new homes were added to the village housing stock through in-filling and brownfield developments between 2000 and 2015.

GBC attributes the need to inset East Horsley to NPPF requirements, arguing that the test for remaining ‘washed over’ is that the village should make an important contribution to the openness of the Green Belt. This East Horsley clearly does. No less than 36% of East Horsley is composed of woodlands, whilst inside the settlement area there is an average housing density of just 8.1 dwellings per hectare (‘dph’). Woodlands and large residential gardens make a vital contribution towards bio-diversity, provide wildlife corridors, and furnish those open spaces which are vital to the character of the greenbelt. It is one thing for a planner to study a map and see a settlement area filled with housing, but it is quite another actually to come to a rural village like East Horsley and see how the Green Belt has preserved the rural character and openness of this village.

Today East Horsley is a picturesque and flourishing rural community, which has and continues to experience steady incremental growth as a result of being ‘washed over’ by the Green Belt. As the saying goes: “If it ain’t broke, don’t fix it”. This applies to East Horsley in the matter of insetting.

EHPC therefore OBJECTS to the proposal to inset East Horsley from the Green Belt and requests that this proposal be dropped from the Local Plan.

**b) Paragraph 4.3.16 and Proposals Map: Settlement Boundary changes in East Horsley**

GBC are proposing to make a number of changes to the settlement boundaries of East Horsley and so expand the settlement area, as set out in the Proposals Map, with the justifications seemingly provided in the Green Belt & Countryside Study prepared by the consultants, Pegasus.

We object to two specific boundary changes, which have been proposed, as follows:

1. There is a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Ockham Road North up to the eastern boundary of Lollesworth This proposal removes over 5 hectares of agricultural fields from the Green Belt. The present boundary line is clearly defined by a deep and well-maintained drainage ditch which is classified by the Environment Agency as a ‘main river line’ and therefore
represents a highly defensible Green Belt boundary.

Moving this boundary west to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. We do not believe this proposal can be considered as an exceptional circumstance. Clearly the only justification for this change is to bring a large agricultural field within the settlement area in order to provide more housing land. However, under NPPF rules this is not a sufficient justification for changing a Green Belt boundary. As such, we believe it is an invalid proposal.

EHPC accordingly OBJECTS to this proposed boundary change.

2. There is also a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Kingston Avenue up to a tree line running along the Parish Boundary at the western edge of Kingston The result is to take all of Kingston Meadows out of the Green Belt.

Kingston Meadows is the main public recreational space of East Horsley, comprising various sports facilities and playing fields. The present settlement boundary is clearly defined by a deep and well-maintained drainage ditch running along its eastern side. It therefore represents a very defensible Green Belt boundary. Moving this boundary westwards to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. We do not believe that this can be considered as an exceptional circumstance. As such we believe this is an invalid proposal.

EHPC accordingly OBJECTS to this proposed boundary change.

In the Green Belt & Countryside Study and its accompanying Topic Paper, GBC justifies the need to make changes in settlement boundaries in order to meet unfulfilled housing need in the Borough. However, Green Belt rules make it clear that unfulfilled housing need is not normally considered to be ‘an exceptional circumstance’. If it were the entire Green Belt would already be covered in tarmac.

The NPPF is clear that every movement in settlement boundaries must be justified by ‘exceptional circumstances’. GBC have offered only a generic justification in their Topic Paper of meeting unfulfilled housing need, but a case by case justification has not been provided. As such, we believe the settlement boundary changes referred to above (and many others) are invalid without such detailed justification.

c) Paragraph 4.3.17: Proposal to remove Wisley Airfield from the Green Belt

EHPC OBJECTS to the proposal to remove Wisley Airfield from the Green Belt. The only justification for this proposed change is unfulfilled housing need which is not considered an exceptional circumstance. The proposed Wisley development is discussed further below in the Site Allocation section.

d) POLICY P2: Limited In-filling

A new planning designation has been introduced called ‘the identified boundary of the village’. For East Horsley this covers a number of roads south of the A246. It is a sizeable area, covering 45 hectares, the equivalent of 23% of the present Settlement Area of the village. Within this area, Policy P2 sets out proposals that would allow ‘limited in-filling’ within this boundary.

We find it hard to reconcile the opening statement of Policy P2 that “We will continue to protect the Metropolitan Green Belt” with this sizeable reduction in effective Green Belt status. In our opinion, this policy represents a de facto extension of the Settlement Boundary and a substantial reduction in the operational effectiveness of the Green Belt, whose effectiveness is significantly weakened where this new planning designation applies.

EHPC accordingly OBJECTS to the proposal to designate roads south of the A246 as being within the ‘identified boundary of the village’ and to allow limited infilling within this area.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18123  Respondent: 10910273 / Lynda M Williams  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We have no objections to this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18126  Respondent: 10910273 / Lynda M Williams  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18128  Respondent: 10910273 / Lynda M Williams  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18111  Respondent: 10910273 / Lynda M Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We support the objective of favouring sustainable development as set out in Policy S1. It is in effect merely repeating what is already NPPF policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18113  Respondent: 10910273 / Lynda M Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This policy sets out the objective of adding 13,860 new homes to Guildford Borough over the 2013-2033 period of the Proposed Submission Local Plan, equating to an annual build of 693 new homes per annum.

EHPC has serious concerns about the enormous scale of this building programme, which represents a net increase of 25% in the housing stock of Guildford Borough, a remarkable rate of increase for a borough in the English Home Counties. It is even more remarkable when the official statisticians at the Office of National Statistics (“ONS”) are projecting a population increase of some 15% for Guildford Borough over this same period.

Some explanation for this mismatch may partly be found in the conclusion of the West Surrey Strategic Housing Market Assessment, (“SHMA”), which looks at how the annual housing target of 693 homes is comprised. It estimates that 517
homes per annum arise from ‘the demographic starting point’ – effectively what the official statisticians at the ONS and the Department of Communities and Local Government (“DCLG”) are predicting Guildford will require based upon their population and household forecasts. To this is added in the SHMA another 120 homes per annum in order to ‘support economic growth’, a further 31 homes per annum to ‘improve affordability’ and 25 homes due to ‘student growth’, all of which totals up to 693 homes per annum target.

EHPC finds this analysis perplexing. Economic growth is already factored into the statistics produced by ONS and DCLG, so what GBC are proposing actually comes on top of the official household growth forecasts for the borough. Moreover, the GBC Affordable Housing Policy H2 is proposing that all development sites (other than the very smallest) will be required to have 40% of their homes offered as affordable housing, so why another 31 homes per annum is needed as affordable housing on top of this 40% ratio is quite incomprehensible.

Furthermore, DCLG research has concluded that there is on average a 97% correlation between population growth and household formation. Therefore, if GBC’s target of a 25% increase in housing stock were actually realised, the outcome will be that Guildford Borough would see its population rise by around 25% over this period. This means that the resultant population growth for Guildford Borough would be at a level 67% higher than the official forecasts.

One of EHPC’s particular concerns in reviewing the Proposed Submission Local Plan is that the impression is conveyed upon the reader that GBC’s housing targets are effectively needed to fulfil NPPF requirements or because of central government policy – in other words that GBC has no real choice but to put forward these projections, unpalatable though they might be. However, the reality is very different. GBC has voluntarily chosen to pursue a policy of aggressive civic and economic expansion – one might perhaps term it a policy of ‘Forced Growth’ – which underpins all of the housing policies in the Local Plan. In short, the difference between the official statisticians’ forecasts and GBC’s target of a 25% increase in housing stock is entirely down to a political choice made by GBC.

Of course, there is nothing fundamentally wrong in GBC adopting a Forced Growth policy for the Borough – not so long as that policy is made clearly and explicitly and is fully supported by a majority of its electorate. However, EHPC doubts whether this is actually the case. It is certainly not a vision that is shared by EHPC, which unequivocally rejects GBC’s Forced Growth policy.

EHPC accordingly OBJECTS to the borough housing targets set out in Policy S2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2430   Respondent: 10910369 / Karen Doyle   Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to Policy A25 Gosden Hill as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt, which will see coalescence and urban sprawl from Burpham to West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to the inclusion of strategic site Policy(A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local community. This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4803  Respondent: 10910369 / Karen Doyle  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43a, the proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I OBJECT to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt</td>
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<td>I OBJECT to Policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough</td>
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<td>I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley</td>
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<td>I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency</td>
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<td>I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon</td>
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I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3397  Respondent: 10910433 / Linda Willis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I appreciate the massive amount of work this is entailing over many years but I have several objections:

1. I object to a 2000 house village at Wisley Airfield. This will cause traffic congestion for the whole area in particular Ockham, Ripley, East and West Horsley, Send, Effingham and further afield. This will cause Utter chaos on the A3 at the M25 intersection, Ockham and Ripley roundabouts and all villages between Cobham, Dorking, Merrow, Woking. There would be extra pollution at Jnctn 10 which is already at a risky level. There would be so many extra people and children that the Horsleys and surrounding villages would be unable to sustain without enlarged shopping areas, more schools and medical facilities. Not to mention trains and parking. This would make us an urban area and we are supposed to be in Green Belt’ which was never supposed to be withdrawn, otherwise it joins us on to London via Kingston and Esher in an urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7490  Respondent: 10910433 / Linda Willis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all the pockets of green breathing space being infilled in East and West Horsley, and surrounding villages. This would completely spoil the feel and look of the village. There must be some brownfield sites in larger towns like Guildford and Woking? Why does everybody have to be accommodated in the South East. Are Sheerness and the Isle of Sheppey and the Isle of Grain overloaded like we are in danger of being? Maybe some new towns with agriculture and light industry could be encouraged there. Or further north using up some of their green spaces.D1

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The fields off Keens Lane, in the Guildford Borough Council Draft Local Plan for the development of a care home plus 140 homes should be removed for the following reasons:

1. The area is Green Belt which must be protected because once you have built on the land it will be lost forever.
   1. It is a migration route for deer and they follow a path back and forward across the fields on a daily basis.
   3. Keens Lane is too narrow to support the extra traffic, it can be dangerous to drive down as it is.

1. The roads going into Guildford from this end of town are too narrow to support a bus lane and cannot support the extra traffic that the new homes would bring.
   3. These new homes would be too close to Whitmoor Common which is a Site of Special Scientific Interest,

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The fields by Keens Lane/Tangley Lane/Gravetts Lane in the Guildford Borough Council Draft Local Plan for the development of an OAP home plus 140 homes should be removed from the development plan because.

1. The area is Green Belt and must be kept for future generations.

1. We see deer move across these fields every day and they need their habitat route to be kept safe.

1. Bats live in the field to the left of our house.

   4. Keens Lane cannot support the extra cars, it is dangerous already.

1. The Aldershot Road is very dangerous already and has too many serious accidents as it is.

1. Traffic in Guildford is already a nightmare and cannot support the extra cars that will come with extra houses.

   7. Whitmoor Common is a Site of Special Scientific Interest, and needs to be protected along with the other common land around Worplesdon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3071  Respondent: 10910625 / Alyson Blackwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object that there has not been and demand that (a) there should be a significant challenge to the GBC scenario planning and (b) the housing and growth numbers should be revised and especially in the light of uncertainty and change which will accompany Britain’s withdrawal from the EU.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3073  Respondent: 10910625 / Alyson Blackwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Clandon

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the Settlement Boundary, which has been imposed on East Clandon without any consultation. This imposition provides no protection to further development outside of the settlement boundary (Policy P2 para 4.3.25) and is deemed by me as being unnecessary in an already tightly developed ancient and rural conservation village with high archaeological merit. This proposal needs to be removed as it will endanger the openness of the Green Belt, the views in and out of the AONB (protection of the AONB Policy P1) and the character of our village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12737  Respondent: 10910625 / Alyson Blackwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy D4: I object to the insetting of villages (meaning in fact, removal of villages from Green Belt protections) and the fact that they will suffer from higher density development and the resulting increase in traffic, increased use of infrastructure which is already under pressure. I object in particular to the insetting of West Clandon, Send and the Horsleys. This will have a detrimental impact on Green Belt openness and the views in and out of the AONB in direct contravention of Policy P1 and P2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12741  Respondent: 10910625 / Alyson Blackwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that infrastructure has not been properly assessed and is inadequate to deal with current housing levels – roads, doctors, schools will not be able to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12742  Respondent: 10910625 / Alyson Blackwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object that housing being proposed on the Green Belt will increase traffic bringing increased danger and pollution and slower journey times on our already overcrowded village roads and surrounding areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/12732</th>
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Policy P2 – Green Belt: I object to this significant erosion of the Green Belt with the proposals for large towns being developed on Green Belt land thereby removing the openness of the Green Belt. I note in particular the huge developments proposed for the North East quadrant of the borough which will adversely affect our amenity, but also unfairly targets our tranquil rural villages because we can provide ‘dormitory’ facilities for commuters to London. The developments directly affecting our villages are the proposals for Wisley Airfield, Gosden Hill Farm, various farms and tracts in the Horsleys and Garlicks Arch at Send.

Further, on the erosion of Green Belt and I object that Policy P2 is not met where it states that Green Belt should be protected. I object to the disproportionate use of Green Belt land for housing – some 65% of the housing proposed is on Green Belt and with little consideration being given to redevelopment of brown field sites.

I object that GBC are contravening the NPPF framework stipulation in paragraph 87 with the proposed developments at Gosden Hill Farm, Ripley, East and West Horsley and Garlicks Arch, Send. Paragraph 87 states “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.” and GBC have not proven any special circumstance for developing on these Green Belt areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**I object** to building on the Green Belt because the essential characteristic of Green Belt is its openness and permanence (National Planning Policy Framework paragraph 79).

**I object** to all other strategic sites in the Local Plan, Blackwell Farm, 3 Farms Meadows, Garlick’s Arch, West Horsley and Hog’s Back. All are out of proportion to the surrounding area and none qualify for the exceptional circumstances required to take them out of the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
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**I object** to Policy S1 not offering sustainable development as regards roads and rail infrastructure which currently does not cope with demand, congestion on the A3 in particular, but also other A roads in the area such as the A247, the A246 and then there is the already overcrowded and slow train system for those currently living in the borough and needing to commute to London. No pre-emptive planning has been made to alleviate these real problems which will be much exacerbated by any large increases in housing.

I specifically want you to note the winding, narrow and dangerous route via the A247 through West Clandon which then drives people to use a short-cut the even narrower rural road, the Ripley Road, through East Clandon to and from the A3. This will be much exacerbated with the large increase in housing twinned with large increase in cars and travel.

Continuing with Policy S1 (Presumption in favour of Sustainable Development) **I object** that this is not being met and that GBC are contravening this when it is clear that no fixed plans are available to improve the provision of shops, medical facilities, schools in our immediate area (besides roads and rail already mentioned) to service us. If the GBC were serious about improving the infrastructure and sustainability of our communities, they would have secured plans and funding to ensure these facilities are available and not just at the behest and hoped-for goodwill from the developers. Further, how will developers be held accountable to their promises to build infrastructure. Stories are legion of developers reneging on commitments as the ‘money runs out’ even though vast profits will be made from turning agricultural and Green Belt land into highly valuable housing land.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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In response to the Consultation, I **object** to the 2016 Draft Local Plan as a whole and in particular I object to the specific issues (listed below). I believe that this deeply flawed Local Plan will have a direct and detrimental effect on the amenity currently enjoyed by the residents of East Clandon and to the even greater detriment to our neighbouring villages of West Clandon, Ripley, West and East Horsley. It erodes the openness of the Green Belt and endangers the beauty and views in and out of the Surrey Hills AONB.

My specific points are:

I **object** to Policy S2 for the proposed provision of the very high overall housing numbers of 13,800 new homes (690 new dwellings being built every year for 20 years) and I **object** on two grounds; these housing numbers have been imposed on the borough with no real consultation being undertaken with the residents of East Clandon and the borough as a whole. Secondly, the housing numbers are based on a high-growth economic development plan which in itself has had no consultation with us and this combined with estimated demand from London residents will turn Guildford into a dormitory town for London.

Further, I **object** to the fact that no real economic or housing demand factors have been provided by the borough planners to substantiate the very high housing target of 13,800 new dwellings over the next 20 years. This is in direct contravention of the NPPF’s requirement for the planning authority to provide meaningful consultation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** SLP16/1508  **Respondent:** 10910625 / Alyson Blackwell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

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I object to the fact that GBC have not met the requirements of the NPPF Paragraph 155 which imposes an explicit obligation to have early and meaningful consultation. This has not been met in a number of areas by GBC. We have not had a meaningful consultation on imposing a settlement boundary on East Clandon, on the absence of meaningful economic and population growth figures for Guildford showing various scenarios with high, medium and low growth scenarios being offered.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** SLP16/1509  **Respondent:** 10910625 / Alyson Blackwell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
I object to the fact that GBC have not met the requirements of the NPPF Paragraph 155 which imposes an explicit obligation to have early and meaningful consultation. This has not been met in a number of areas by GBC. We have not had a meaningful consultation on imposing a settlement boundary on East Clandon, on the absence of meaningful economic and population growth figures for Guildford showing various scenarios with high, medium and low growth scenarios being offered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1510  Respondent: 10910625 / Alyson Blackwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

I note that there were over 20,000 responses objecting to the 2014 draft Plan and therefore I object that the Consultation Process has not been properly followed for this Plan which is not materially different from that plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2922  Respondent: 10910753 / Heather Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

I note that there were over 20,000 responses objecting to the 2014 draft Plan and therefore I object that the Consultation Process has not been properly followed for this Plan which is not materially different from that plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/2921  **Respondent:** 10910753 / Heather Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan. Why are the council failing to publish this report?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/4179  **Respondent:** 10910753 / Heather Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In addition to this, I object to the fact that the housing need in this area has not been properly assessed and the number of houses needed seems to have been inflated.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/4176  **Respondent:** 10910753 / Heather Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley

...
I object to the Proposed Local Plan as the impact on village life will be disastrous and irreversible.

I object to the Proposed Local Plan because these major developments would have a severely detrimental affect on the life of the people who live and work in this area. The problems caused by increased traffic, both domestic and commercial, would cause major problems on local roads. The proposed four way on/off ramp on the A3 would not alleviate traffic, but simply enable developers to go ahead with their plans and, in the process create vastly more traffic. The proposed building of 2000 homes at Wisley, another 2000 at Gosden Hill, 400 at Garlick's arch would bring the total of building in this area to 4000 with the additional traffic created by the proposed industrial untis. The traffic implications are horrendous. The whole plan is simply ill-conceived.

I object to the Proposed Local Plan because the roads in the area affected by these plans are, in many cases narrow, single track and without pavements. I live in such a lane and my neighbour was, on one occasion, told by a passing police.

I object to the Proposed Local Plan because there is not the infrastructure to support building on this scale in such a small area. The local schools and doctors' surgeries would find it impossible to cope with the influx of people.

I object to the Proposed Local Plan because the pollution from such development would be detrimental to the health and well being of the communities of Send and Ripley. Asthma is already very common amongst young children with pollution levels being already higher than advised.

I object to the Proposed Local Plan as it necessitate taking much of the land around the villages out of greenbelt when the circumstances are not 'exceptional' as is required by law. The reasons for this appear simple – green belt is more cheaply acquired, but once taken out of green belt it suddenly becomes much more valuable. It may be cynical, but it appears that there are certain individuals, possibly with off shore accounts, who are likely to make a lot of money out of this unscrupulous deal. They are not the people who elected you – we are and, therefore you should represent our wishes, not theirs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5235  Respondent: 10910753 / Heather Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object specifically, to the inclusion of the former Wisley airfield. If this proposal is adopted, and the plans put forward by the Cayman Islands based company go ahead, Guildford Borough Councillors will be responsible for the destruction of village life in this part of Surrey, in direct conflict with the promises that were made to the people who elected them as their representatives. The volume of traffic, pollution and the loss of important habitat will all be the blight that is created. The fact that this corner of the borough, on green belt land, should be sacrificed so that questionable housing targets should be met is a betrayal. Should the plans for this site, along with Garlick's Arch go ahead, there will be 2,500 new houses in the area.

I object because I was one of many who attended the council meeting on 8th April 2016 in which the Planning Committee unanimously rejected the application put forward by Wisley Property Investments Ltd. It seems astonishing, therefore, that after serious concerns have been raised by a broad number of, sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency, this site is still considered to be suitable for inclusion in the Local Plan.

I object because the proposed building on this site would result in this part of Surrey becoming part of the urban sprawl from London. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

I object to building on the scale proposed for this site as the impact on our road systems will be catastrophic. Many of the roads in the area are narrow, some only single lane. In addition to this, there are no pavements. The prospect of having an additional 4,000 cars using these roads each day is not to be countenanced.

I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation and prove detrimental to the health of local residents.

I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

I object to the draft Local Plan because when certain councillors put forward their objections at the council meeting on 24th May 2016 they were told by the leader of the council, Councillor Spooner, that if the site was not accepted for inclusion in the plan it would mean that they would be responsible for other villages having to bear the brunt of such development. I fail to see the legitimacy of this argument. It also appeared that councillors were being warned to accept this draft plan or the villages they represented would be back in the frame. Is this the premise upon which the plan should be built?
I object to the draft Local Plan because considering this from an entirely cynical point of view, it may appear that the vast sums of money that would be involved should this plan ahead, have tipped the scales of justice. Certainly, those behind WPI have no real interest in the needs of people in the borough and have seen the profits to be made when purchasing green belt land cheaply and then attempting to have its status overturned so that they can sell that land, with outline planning permission, at a vast profit. I doubt that these people live in the area and, by their actions, show they have no love of the area, unlike those of us who live here. The voters of this borough elected its council representatives on the promise that they would protect the green belt. If they adopt this proposal, they will have reneged on this promise and, in doing so, failed their electorate.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect in order to save the countryside for the generations which follow.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5990  Respondent: 10910753 / Heather Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Garlick’s Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for it’s removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance.

The Plan states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch.

- There is no sustainable transport infrastructure.
- The site is liable to frequent flooding
- It has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.
- There are no plans to improve local schools, medical or utilities to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5989  Respondent: 10910753 / Heather Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
North facing ramps to the A3 at Burnt Common would be a disaster for local communities, which do need to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. E.g. all traffic from London/M25 to Woking would go through Burnt Common, Send and Old Woking. This is not sustainable as this cannot be improved. Ripley High Street and Send Road are already very busy roads which are, at times dangerous to cross. If the Local Plan is adopted in its present form, the potential increase in traffic will also be accompanied by an unacceptable rise in air pollution. This is already excessive in this area with pollution from the A3 and M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to the Proposed Local Plan because, in effect, it merges the villages along the A3 in to a new urban sprawl. In the process, the individual villages, along with their very individual identities, will be lost for ever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/12157  Respondent: 10910753 / Heather Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12148  Respondent: 10910753 / Heather Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses means dangerous and unsustainable traffic. I live on a narrow lane, single track in places, with no pavements. We already run the gauntlet of speeding traffic when we go out of our drive. One of my neighbours was told by a passing policeman that she shouldn't walk her children down the road for this reason.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12159  Respondent: 10910753 / Heather Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17177  Respondent: 10910753 / Heather Thompson  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Proposed Local Plan because Send Road is already a highly congested and crossing from one side to the other is hazardous. I know this first hand as my mother lived on one side of the road and was too nervous to cross to the other side to use the local shop. Similarly, some years age her elderly neighbour was knocked down and killed on this same stretch of road. Send is a small village, not a major conurbation. The traffic through Ripley would, similarly, destroy the village, if the proposed 2,500 houses and industrial units suddenly be incorporated in to the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12161  Respondent: 10910753 / Heather Thompson  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health. Pollution is already unacceptably high in this area with emissions from the A3 and M25</td>
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<td>I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy. These sites have been targeted by developers who ho have no interest in the area. They are simply looking to make massive profits by buying green belt land at for a modest sum and selling it for a massive profit once its green belt status has been withdraw. Is this why the existing brownfield site at Burnt Common has been shelved and Garlick's Arch has been substituted at the last minute? The Plan should develop the this existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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The Plan does not take adequate account of flood risk as required by National Planning Policy. The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPP16/12144  Respondent: 10910753 / Heather Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick’s Arch.

The development should be in urban areas where there is sustainable transport.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPP16/12151  Respondent: 10910753 / Heather Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing. It seems that these villages are to be sacrificed so that the council can fulfil its questionable target.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages. This sort of development is in direct contradiction to government policy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I object to removal of Brownfield site (A34) from the Plan
Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Once again, I find that I must object to the Guildford Borough Councils inclusion of Three Farms Meadows in the 2017 Local Plan. As someone who attended the council meeting in which all proposed plans to develop this site were unanimously rejected for very good reasons, I find it hard to understand how it can still be included in this draft. As a resident of Ripley I know that if this development goes ahead, the very nature of this corner of the borough will be destroyed. I will render it nothing more than a suburb of London. The council seems to have no qualms about destroying the green belt which, by it's very nature, is designed to ensure that the urban sprawl is not allowed to simply go unchecked. This, along with other planned developments in Send and Clandon will result in the end of village life here. The villages will simply merge into a new town.

I have attended meetings and seen projected plans for the development of this area and believe that there is a cynical use of green belt land which can be bought cheaply but, once planning has been granted, can then be sold on for a premium. There are those who seek only to make a large profit. The real needs and wishes of the communities involved are simply ignored. Green belt is being exploited in preference to genuine brown field sites for this reason. Those who stand to make vast amounts from this site are registered in the Cayman Islands. They are not paying UK tax and have no interest in
improving the lives of those of us who live in the borough.

My reasons for objecting to Policy A35, Three Farms Meadows, in the draft 2017 Local Plan are as follows:

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congestion junction in the country (J10)
4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   ○ The associated traffic increase from the RHS has not been taken into account.
   ○ The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account
8. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station
10. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
11. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”
12. Opportunity (3) should be common to all sites and is not unique to this site
13. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
14. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
15. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
16. I object to the removal of additional 3.1 ha from the green belt without any justification
17. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact
18. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3
19. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
20. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.
21. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
22. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a Regulation 19 consultation when the changes are major.
23. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.
24. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.
25. I object to the extension of the plan period by 1 year as it has not been identified as a major change
26. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
27. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.
28. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
29. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

30. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

31. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

32. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

33. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

34. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

35. I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development. I particularly object to the reliance on the Carter Jonas study update 2017 which includes “demand” for retail space from companies already in administration.

It is for these reasons, therefore, that I believe that this plan is not fit for purpose and I now await Guildford Borough Council's response to my objections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3738  Respondent: 10910753 / Heather Thompson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Once again, I find that I must object to the Guildford Borough Council's inclusion of Three Farms Meadows in the 2017 Local Plan. As someone who attended the council meeting in which all proposed plans to develop this site were unanimously rejected for very good reasons, I find it hard to understand how it can still be included in this draft. As a resident of Ripley I know that if this site remains in the plan and is developed in the way that has been suggested by the owners of the land, the very nature of this corner of the borough will be destroyed. I will render it nothing more than a suburb of London. The council seems to have no qualms about destroying the green belt which, by it's very nature, is designed to ensure that the urban sprawl is not allowed to simply go unchecked. This, along with other planned developments in Send and Clandon will result in the end of village life here. The villages will simply merge into a new town.

I have seen projected plans for the development of this area and believe that there is a cynical use of green belt land which can be bought cheaply but, once planning has been granted, can then be sold on for a premium. There are those who seek only to make a large profit. The real needs and wishes of the communities involved are simply ignored. Green belt is being exploited in preference to genuine brown field sites for this reason. Those who stand to make vast amounts from this site are registered in the Cayman Islands. They are not paying UK tax and have no interest in improving the lives of those of us who live in the borough. This seems to be happening on a national scale and is a disgrace.

My reasons for objecting to Policy A35, Three Farms Meadows, in the draft 2017 Local Plan are as follows:
I object to the inclusion of this site in the 2017 Local Plan because it will be adjacent to the most congested stretch of roads in the country, junction 10 of the M25. In addition to this, the neighbouring roads, many of which are little more than country lanes, which already carry a high volume of traffic, will be negatively impacted. Living in a narrow lane, which is already a rat run, I know only too well of the impact development here would have. When the increased traffic that is projected due to increased visitor numbers to RHS Wisley is added to this the result can only cause misery for those living here.

I object to the inclusion of this site in the 2017 Local Plan because alongside the very significant increase in traffic movements, there will be a very significant increase in air pollution. The quality of our air as a result of the heavy traffic on the M25 and A3 already fails to meet statutory limits. The increase in asthma, particularly amongst children in the area, is disturbing. As a child brought up here, I can attest that when I was a child asthma was unusual, not the norm as it has almost become today.

I object to the inclusion of this site in the 2017 Local Plan because the access to the train network from this site is highly problematic. The roads surrounding the development are little more than country lanes and the suggested solution, that commuters could walk or cycle to the nearest railway station, is ridiculous. To suggest a bus service to Horsley again is not viable. The prospect of walkers, cyclists and buses using these narrow roads is completely unrealistic.

I object to the inclusion of this site in the 2017 Local Plan because the increase in area is on the south of the site and faces the Surrey Hills ANOB. The projected building on this area, in places several storeys high, would be a true blot on the landscape of this protected area. The removal of a further 3.1 hectares of green belt land is totally unjustified and unnecessary.

I object to the inclusion of this site in the 2017 Local Plan because one of the major issues is the provision for dealing with the large amount of sewage that such a site will generate. This will prohibit the plan from contributing to the five year housing projection.

I object to the inclusion of this site in the 2017 Local Plan because the housing number and the fact that the council has not used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA.

I object to the inclusion of policy S2 in the 2017 Local Plan because it states that the figures in the Annual Housing Target Table add up to 12,426, when, in fact, they add up to 9,810. There seems no account taken of the missing 2,616. This anomaly suggests that the figures are not to be trusted.

I object to the inclusion of this site in the 2017 Local Plan because the council has failed totally to take into account all of the objections raised by those they purport to represent. This is to disregard the fact that they are our democratically elected representatives and have a responsibility to act upon the wishes of the electorate. The promise by those on the council when elected was to protect the green belt. This promise is being flagrantly broken.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2443  Respondent: 10910753 / Heather Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
**I object to removal of Brownfield sites (A4) from the Plan**

Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/2446  **Respondent:** 10910753 / Heather Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

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**I object to the increase in housing proposed in Tannery Lane (site A42)**

This has been increased by a third since the 2016 version of the Plan. This will have a significant impact on the already highly congested local rural road network around Send. This is in contradiction to section 2.14a of the Plan which states “Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays.” And yet there is no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/2433  **Respondent:** 10910753 / Heather Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

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**I object to the extended development in the Green Belt (Policy P2, Site A43)**

I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

**I object to the allocation of 6 Traveling Showpeople sites in A34 Garlick’s Arch**

The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlicks Arch as this
development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.

I object to the potential and ill-defined increase in housing allocation at A43 Garlick’s Arch
The potential of an increase from 400 houses at site A43 Garlick’s Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages.

The inclusion of site A58 Burt Common, removes the need for A43 Garlick’s Arch
GBC’s own reasons for including Garlick’s Arch A43 in the 2016 version were
a) The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm, … (site allocation A25) [ than the Burnt Common site did ]”
b) The site [A43] provides the employment floorspace needed in the plan to help meet identified needs”
Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (which are almost contiguous) are in the plan; therefore GBC are not following their own guidelines and objectives.

Since A58 Burnt Common is now in the Plan (2017) more than the “required” industrial space is available there, so there is no reason for Garlick’s Arch to be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2442  Respondent: 10910753 / Heather Thompson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The inclusion of site A58 Burt Common, removes the need for A43 Garlick’s Arch
GBC’s own reasons for including Garlick’s Arch A43 in the 2016 version were
a) The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm, … (site allocation A25) [ than the Burnt Common site did ]”
b) The site [A43] provides the employment floorspace needed in the plan to help meet identified needs”

Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (which are almost contiguous) are in the plan; therefore GBC are not following their own guidelines and objectives.

Since A58 Burnt Common is now in the Plan (2017) more than the “required” industrial space is available there, so there is no reason for Garlick’s Arch to be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2441  Respondent: 10910753 / Heather Thompson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46
I object to the unfair imbalance of the Plan across the borough.
With the removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan has become even more biased against the North East of the borough. Guildford Borough is over 100 square miles. Of the 11350 homes proposed in the Plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2440  Respondent: 10910753 / Heather Thompson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A50

The Plan is self-inconsistent in respect of traveller sites.
A50 Whittles Drive, Normandy, shows on the Site details: “Allocation: The site is allocated for approximately 14 Travelling Showpeople plots …” Clearly A50 more than covers the total “need” of 8, (page 40, 4.2.22.) and so no “need” exists for this in site A43. This and other inconsistencies in the Plan mean no decision can be made on the basis of this document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2445  Respondent: 10910753 / Heather Thompson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58
I object to the proposal for a Waste Management Facility in Green Belt (A58)
The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/853  Respondent: 10910753 / Heather Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object the change in policy on affordable homes (Policy 4.2.23)
The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.
The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit IS to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/855  Respondent: 10910753 / Heather Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the lack of proper infrastructure planning for sites (A43 and A42).
The Foreword to the plan by Paul Spooner includes on page 5:
"We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan”.

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

The most distressing element of this plan is that such a large proportion of the overall proposed development is being targeted on this small part of the borough. It is simply disproportionate and there is little understanding being shown by those elected to represent our views. I trust, therefore, that these objections will be given your full attention and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/854  Respondent: 10910753 / Heather Thompson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object removing Send Business Park from the Green Belt (4.3.15).
Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4378  Respondent: 10910785 / Clare Curtis  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Key Evidence document ‘Guildford Borough Economic Strategy 2013-2031’ makes no case for locating large numbers of homes in West and East Horsley or neighbouring villages. Proposed new economic development site proposals are on the opposite side of the Borough to West Horsley: Presumption in favour of Sustainable Development (Policy S1), Borough Wide Strategy (Policy S2), Homes for all & Affordable Homes (Policies H1, H2).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

People using East Horsley’s shops and its Public Library in 2016 experience more and more difficulty in parking their cars at most times of the day. The proposed large increase in population of West and East Horsley will make parking and movement into and through the village considerably more difficult and time consuming.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 10910785 / Clare Curtis</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposed expansion of West Horsley village is unsustainable. With only one small shop, no post office, a very limited weekdays only bus service through the village, it is clearly unsustainable for the proposed high volumes of new housing development. The development of 385 homes on the four proposed sites are at much higher densities than currently exist in the village settlement and will be totally out of character with the existing mix of different housing styles and layout of the village. The homes building proposals are unsustainable in terms of schooling, drainage, roads capacity, shops, parking in East Horsley (shops and station) and public transport.

The need for so many houses to be built in West Horsley over the first 5 years of the Plan period 2018 to 2033 is totally unproven. The West Horsley Parish Council and Surrey Community Action Housing Survey: May 2014, identified a limited need for some 20 affordable homes for local people who want to remain in the village, i.e. for young people and for elderly people who wish downsize to a smaller home.
There is a continuing lack of state primary school places in the village. The Raleigh School which serves both East and West Horsley is full every year and this has been the situation for many years. Secondary school places are also limited in number at the Howard of Effingham School and other secondary schools involve greater travel times and further distances. Glenesk and Cranmore private schools are well supported by many families living in Guildford and other villages up to 14 miles away. Each of these private schools during term time, receives high volumes of traffic going to and from the schools at the beginning and end of the school day, on Ockham Road North and the A246, respectively, already causing congestion.

Kingston Avenue Medical Centre, serving all of East and West Horsley and areas beyond, is always extremely busy and residents experience difficulty in making appointments. The planned population increase (in excess of Government ONS forecasts) for the Borough will require a major extension of the Royal Surrey Hospital to cope.

Whilst Horsley station has frequent trains to London and Guildford 7 days a week, the station car park is normally full on weekdays. An increase in village population will increase pressure on station parking and traffic movements to and from Horsley station to drop off and collect travellers to London and school children going to Guildford and Leatherhead.

The increased level of traffic from the proposed new housing estates will be considerable. Most households in rural areas as a necessity have 2 cars, many having 3. Journey times on local roads will increase significantly.

There are known sewage overflow problems in the Ockham Road North/Green Lane area. Thames Water has advised Guildford Borough that the area’s wastewater network is unlikely to be able to support the demand anticipated from all the proposed developments. The foul drainage system from West Horsley to the treatment works north of Ripley, will need to be upgraded to cope. Thames Water advise ‘a 2 to 3 years lead-in period’ to install the necessary waste water network and treatment capacity after planning permission for a development is granted.

It is for these reasons that I strongly object to the GBC Local Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/17854  **Respondent:** 10910785 / Clare Curtis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

The first line of Policy P2 states, ‘We will continue to protect the Metropolitan Green Belt against inappropriate development.’ I am totally opposed to the village's removal from the Green Belt by insetting and extending the 2003 Local Plan Settlement Area boundaries. No exceptional circumstances or other justification is made for the new Green Belt boundaries that will result from the proposed insetting of the two parts of the village from the Metropolitan Green Belt. I believe the Green Belt & Countryside Study is flawed. West Horsley's defined Settlement Area boundaries (ref 2003 Local Plan) DO NOT need to be extended. West Horsley Parish is one of a rich and varied mix of well-established low housing density settlements with a considerable number of historic buildings. Positioned on the north side of the North Downs, partly in the Surrey Hills an area of outstanding natural beauty, it attracts a considerable number of recreational visitors (walkers and cyclists) through the seasons each year.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
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<th>Comment ID: PSLPP16/17855</th>
<th>Respondent: 10910785 / Clare Curtis</th>
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<td>Policy S2 states that provision will be made for 13,800 new homes over the Plan Period 2013 to 2033. The number of homes is too high and unsustainable in Guildford’s villages. The Site Allocations list totals 12,698.</td>
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<td>I wish to object to the 2016 Draft Local Plan with the proposed loss of the Green Belt, particularly between Burpham and Ripley, with the proposed developments on Gosden Hill farm and in Send effectively making a continuous series of estates so that we no longer have villages. We in Burpham have already had large developments on the two farms in our village and the inevitability of further increase in traffic in the centre of our village and in Clay Lane is too much!</td>
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<th>Respondent: 10911201 / Claire Walker</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A46</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )</td>
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I object to this 'strategic site' proposal as I believe it would completely destroy our community. It will be an increase of 175% in the population of Normandy over the plan period. It will cause untold misery on our already full to capacity roads. This is a green belt site that is red sensitivity. Removing its green belt status and building 1,100 homes cannot be justified when these fields are within 3 kilometres of the Thames Basin Heaths special protection area. There need to be exceptional circumstances proven to remove land's green belt status. An up to 8 form entry secondary school is neither needed or 'exceptional circumstances'. The local plan states that 'Secondary educational need will be re-assessed at planning application stage' but if the houses have been built and there is no need found for a secondary school it will already be too late, the green belt will have been removed and the fields tarmacked and concreted over. Where will all the water that pours onto the Hogs back and Ash ranges go then, with no fields to soak it up? Glaziers Lane floods regularly as does Wanborough station without the addition of all that is proposed. There is no need for a secondary school as the two closest schools are undersubscribed and the building of houses cannot be used as a reason for a new school because the school is being used as an enabler for the building of the houses on green belt.

There is an inconsistency in putting Normandy and Flexford together when assessing sustainability yet regarding them as separate when assessing sensitivity. It means that the fields between the two settlements that contribute so much to the openness of the green belt, can be ignored.

The two lanes that border the site are at present brought to a standstill if there is a problem on the A31 or A3. The extra traffic that will be generated by an extra 1,100 homes and a secondary school will impact on every resident’s lives, causing chaos on the roads.

A Showmans site is proposed, and I would like to know how it is envisaged to move the large equipment that will be stored on a Showmans site, when there is a low bridge on Westwood Lane and a small humpbacked bridge on Glaziers Lane, just past where pedestrians walking north have to cross from one side of the lane to the other with no view of oncoming traffic.

This is a developer led proposal that Normandy residents have not had an opportunity to comment on until this late stage because this site did not appear in the 2014 version of the Draft Local Plan, so we were unable to make our needs and views known.

The impact this proposal will have on wildlife is enormous. The Skylarks, Barn owls, Little owls, Cuckoos and other birds will lose their habitat. The Glow worms, Adders, Grass snakes and Slow worms will also. The light pollution from a development of this size will impact on our night skies, and the pets associated with these homes will also have a detrimental effect on the wildlife. All this so close to the Thames Basin Heaths Special Protection Area. A SANG is a public relations exercise and in no way makes up for what Normandy is losing.

Economic growth may not be the goal of Normandy residents, their goal may be to live in a rural environment within the Green belt.

I object to the proposed A46 Normandy Flexford strategic site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1250  Respondent: 10911201 / Claire Walker  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A47

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to policy A47. This land should not be built on. It floods over about half of it for nearly six months of the year. This maybe why it's designated as an SNCI and a Water Vole Alert Area. Buffer strips along the edge of the stream are hardly going to mitigate the impact of building 50 homes on this site. There is also a public footpath which will need to be maintained therefore causing more disruption to the wildlife.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1252  Respondent: 10911201 / Claire Walker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A49

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the "insetting" of this land in policy A49. It should not be removed from the green belt. It requires exceptional circumstances for the removal of land from the green belt and none have been shown.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1255  Respondent: 10911201 / Claire Walker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A50

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the insetting of this land in A50 policy. For land to be removed from the Green Belt exceptional circumstances must be shown and none have been.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3858  Respondent: 10911201 / Claire Walker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I still object to the proposals for site A26 Blackwell Farm as a whole despite the small reduction in house numbers. This site should never be developed. It is an integral part of the beauty and special landscape around the Hogs Back. There has already been too much encroachment onto this area, and any further development should take place within the parts already built up. There is plenty of scope for the University to make greater use of the land already occupied eg building above and below car parks etc. The land is actively farmed and is also extremely well used by local families and individuals for walking, running, cycling, horse riding, bird watching, observing flora and fauna, etc, and elimination of this lovely open space will send more people to the Thames Basin Special Protection Area. The infrastructure changes that would be required for a development of this scale, in particular the roads and junctions, would add further destruction to the AONB, AGLV and Green Belt. I also specifically object to the new proposal for a huge secondary school on this site. The evidence collected and submitted last summer showed that that there is absolutely no need for an additional secondary school in the area. The neighbouring secondary schools are currently under-subscribed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3859  Respondent: 10911201 / Claire Walker  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wholeheartedly support the removal of the proposals for Site A46 from the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3861  Respondent: 10911201 / Claire Walker  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A47

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I wholeheartedly support the removal of the proposals for Site A47 from the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1967  Respondent: 10911201 / Claire Walker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the removal of Wanborough from the transport intersections definition.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1968  Respondent: 10911201 / Claire Walker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I welcome the clearer wording regarding timing, phasing and application of planning conditions and obligations. It is imperative that no developments should be approved without clear, acceptable and funded plans in place to provide adequate and effective infrastructure of all types and that even where approval has been given, development must follow provision of infrastructure and not proceed without such infrastructure.

There is concern about the inability of current infrastructure to meet current and future needs. The policy recognises that the “Infrastructure provider” will maintain infrastructure in most cases, and developers can only offer a contribution via Community Infrastructure Levy. Until the current infrastructure can meet existing needs adequately, further development should be very targeted to meet only absolute essentials.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1966  Respondent: 10911201 / Claire Walker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I still object to Policy P2 as redrafted since it still does not address a very large proportion of the thousands of objections made to the previous version. I particularly object to the reference in paragraph 1 to the Policies Map: the words “as shown designated on the Policies Map” must be deleted if this paragraph is to be of any use at all. I object to the proposals that the settlements of Normandy, Flexford and Walden Cottages, and the traveller sites to the rear of Palm House Nurseries (A49) and Whittles Drive (A50), should be inset from the Green Belt. These are all areas and sites contributing to the openness of the Green Belt and also contributing to the views to and from the Hogs Back AONB. I also object to the insetting of other villages from the Green Belt and “infilling” of others and wholesale extension of settlement boundaries across the Borough. Such changes ignore the importance of a permanent Green Belt preventing urban sprawl and providing a “green lung” which should be protected, with any individual changes being subjected to rigorous scrutiny and being dependent on clear demonstration of exceptional circumstances justifying any over-riding of the Green Belt provisions. I would also point out that para 4.3.13 is incorrect and misleading in saying that a long list of villages are now inset from the Green Belt – this simply refers to GBC’s proposal last summer, to which there have been huge objections from residents and which we hope will be rejected through the Local Plan process.

Exceptional circumstances must be demonstrated in order to develop Greenbelt yet despite the weight of public opinion against weakening of this policy, 70% of new housing development will be in the countryside, of which, 58% will be in Greenbelt. By definition, this is not an exception and no attempt is made to demonstrate exceptional circumstances, in line with the requirements of the NPPF. Insetting villages is of concern since restrictions within the settlement boundary raises concerns over loss of character. The Rural Economic Strategy covered in 4.51a, promoting affordable homes everywhere in the countryside including the AONB as a main aim, is a mechanism for promoting overdevelopment in our countryside. It has not been subject to full public consultation and is based on data, which is not up-to-date.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>The housing target proposed, of 12,426 is based on assumptions that have not been made public and includes flaws that have not been corrected in the modified SHMA (verified by professional analyst Neil MacDonald of NMSS who concluded that an annual housing figure of 400 per year would meet Guildford's overall need). The phased approach (more homes built towards the end of the plan period) is appropriate in order to permit necessary infrastructure but open-ended targets where an unknown figure is held back until after the plan period is not a reduction but a postponement and does not allow for optimal planning or transparency.</td>
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Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. The inclusion of 2100 homes on this site would present an unbearable strain on the existing infrastructure and completely alter the nature of the surrounding villages.

• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans. I doubt that any of these homes will be truly affordable to local residents and will lead to a further influx from surrounding areas and thus not meet the requirements of the local population.

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars. At present cyclists are already endangered by the number and speed of cars passing through the area and this will do nothing to improve the situation.
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads which are already congested. At present the roads are in a terrible state with numerous pot holes and the council seems to do little to maintain them.
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3
junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity. In addition the council seems to show no support for measures to reduce traffic on the roads such as the provision of school buses which were once in place but have now been terminated.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
4. Local roads are at capacity particularly when the A3 is not free-flowing (accidents, diversions, roadworks etc).
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded A3 and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000 per annum.
   - The associated traffic increase from the RHS has not been taken into account.
   - The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account.
8. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
9. It remains unclear when/if the Ockham DVOR/DME beacon will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
10. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
11. I object to the fact that the increased area, being on the south of the site facing the North Down AONB will adversely impact the views from the AONB.
12. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.
13. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.
14. I object to para 22 as this does not reflect the impact of the buildings on the surrounding rural area.
15. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objections from local residents and statutory consultees.
16. I object to the Proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
17. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.
18. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
19. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
20. I object to the transport evidence base which has been criticised for using out of date modelling software and is therefore unreliable.
21. I object to the housing number which I believe is unsound.

I consider for the reasons listed above and other reasons, that this plan is unsound and not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/5410  **Respondent:** 10911361 / D Ashby  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**
I continue to object to the inclusion of Policy A35, Three Farms Meadows, in the draft Local Plan for many reasons including:

1. It is the least sustainable strategic site in this plan because of the constraints on the site and the physical location.
2. It is too far from railway stations.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one of the most congested junctions in the country (J10)
4. Local roads are at capacity particularly when the A3 is not free-flowing (accidents, diversions, roadworks etc)
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded A3 and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000 per annum.
   ◦ The associated traffic increase from the RHS has not been taken into account.
   ◦ The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account
8. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
9. It remains unclear when/if the Ockham DVOR/DME beacon will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
10. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
11. I object to the fact that the increased area, being on the south of the site facing the North Down AONB will adversely impact the views from the AONB.
12. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact
13. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3
14. I object to para 22 as this does not reflect the impact of the buildings on the surrounding rural area.
15. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objections from local residents and statutory consultees.
16. I object to the Proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A Regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
17. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.
18. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
19. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
20. I object to the transport evidence base which has been criticised for using out of date modelling software and is therefore unreliable.
21. I object to the housing number which I believe is unsound.

I consider for the reasons listed above and other reasons, that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the latest SHMA report, which says that 693 homes a year are required by the borough, this is more than double the 322 figure used in previous plans.

The Council will not publish the SHMA report, this figure cannot therefore be verified. This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch is in the Green Belt. There are no special circumstances for its removal from the Green. The Government itself state clearly that housing need is not an exceptional circumstance.

The Plan clearly states that the preference for building new houses is on previously developed land, yet the GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6997  Respondent: 10911425 / Andrew Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for it’s removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance.

The Plan states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch.

The site is not appropriate because:

- There is no sustainable transport infrastructure.
- The site is liable to frequent flooding
- The site has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.
- There are no plans to improve local schools, medical or utilities to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/5648  Respondent: 10911425 / Andrew Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The proposed 4 way on off ramp at Burnt Common will be used to facilitate the Gosden farm development and justify the building of the Wisley and Clandon developments. What has not been taken into account is the impact of the increased traffic on the already congested country lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11120  Respondent: 10911425 / Andrew Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15511  Respondent: 10911425 / Andrew Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

There is no need for new industrial sites at Garlick’s Arch (A43) - there is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11118  Respondent: 10911425 / Andrew Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

If all the 5,000 proposed new homes are from the Wisley junction of the M25 and Burpham are built there would be an additional 10,000 new cars using what is already an over congested local roads. Ripley is constantly gridlocked at peak times and the A3 constantly queues back to Burpham.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15506  Respondent: 10911425 / Andrew Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

There is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that. The rural roads in this area are narrow, in poor condition and have no footpaths. The Plan will make the roads dangerous and accidents will become common place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15509  Respondent: 10911425 / Andrew Gray  Agent:
## Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to the lack of proper infrastructure planning for sites (Policy I1)

The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity. There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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### Comment ID: PSLPP16/11121  **Respondent:** 10911425 / Andrew Gray  **Agent:**

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### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

9. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

With the proposed building of 5000 homes in the local area the 14,000 throughout the Guildford area the A3 and M25 would have to be improved before any development can be even considered.

Highways England has no plans to even start considering improving the A3 before 2020.

Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not even be contemplated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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### Comment ID: PSLPP16/15510  **Respondent:** 10911425 / Andrew Gray  **Agent:**
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 10911425 / Andrew Gray</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to poor air quality concerns (Policy I3)

   The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. National planning policy requires that there be exceptional circumstances for the Green Belt boundaries to be altered. I can see no exceptional circumstances for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15505  Respondent: 10911425 / Andrew Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There is no evidence of exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11119  Respondent: 10911425 / Andrew Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7. I object to development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as a Zone3 flood risk which is higher risk than the Council’s own assessment!!
This area has flooded many times in recent years and in fact in the recent heavy rain in June the land stream over flow and the land flooded for 3 days, (photographic evidence available) therefore the Council’s assessment is inadequate and should not to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15507  Respondent: 10911425 / Andrew Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to development in areas which are at risk of flooding (Policy P4)

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment in The Plan. This area has flooded many times in recent years, which I have experiences first hand: the Council’s assessment is not good enough to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11114  Respondent: 10911425 / Andrew Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable. I set out below my objection to specific policies and matters within the Plan.

1. I object to the Local Plan as the development proposed is not sustainable (Policy S1)

The development of nearly 14,000 new houses proposed in the plan is unsustainable; it will create a detrimental impact by over developing the local communities, especially Ripley, Send and West Clandon. Wisley Airfield (A35) and Garlick’s Arch (A43) and Gosden Hill have no railway stations within easy walking distance and inadequate bus services, leaving no alternative for the 5000 new residence to travel by car. The Plan has nothing to improve the infrastructure for Garlick’s Arch.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15504  Respondent: 10911425 / Andrew Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Local Plan as the development proposed is not sustainable (Policy S1)

The 13,860 proposed houses are not sustainable and will damage the villages of Clandon, Send & Ripley by over development. The houses are not necessary or needed in local communities. Wisley Airfield (A35) and Garlick's Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has not made the necessary improvements to infrastructure for Garlick's Arch - thus the local roads will become even more congested & will not be fit for purpose - this is not a sustainable option for modern development. The development should be in urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11116  Respondent: 10911425 / Andrew Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated...
between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of
the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the
borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a
disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of
these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPP16/15508   **Respondent:** 10911425 / Andrew Gray   **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**I object to the Borough Wide Strategy (Policy S2)**

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the
other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35],
Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11%
of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging
urbanisation of identities the villages.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPS16/2725   **Respondent:** 10911553 / G Hayley   **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Objection to Guildford Borough Council Proposed Submission Local Plan

Although I live in Surbiton I drive every week to visit friends in the Borough

I OBJECT to the draft Submission Local Plan for the following reasons:

- I object to the proposal to take so much land out of the Green Belt; new housing should be put on the brownfield land in the urban areas of the
- I object to the proposed number of houses; it seems too
- I object to the proposal to remove the Former Wisley Airfield from the Green Belt; it separates Ripley from
- I object to the urban 2,000 house development being placed in the historic rural village of 159 homes in
- I object to more development which would have an impact on transport, local roads and road The narrow rural roads in Ockham and the surrounding area cannot cope with the extra traffic, which would increase the already severe congestion on the A3.
- I object to the continued inclusion of this site A35 where a recent planning application has already been unanimously rejected by the Planning

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4107  Respondent: 10911553 / G Hayley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please confirm that all of these comments together with all my previous comments are passed to the Inspector.

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including the following:

1. I object to the disregard for the impact on the Thames Basin Heaths SPA, particularly the damage caused by nitrogen deposition and high pollution levels.
2. I object to the inclusion of Site A35 as it will not contribute to the 5-year housing projection due to many constraints including the provision of a new sewerage facility.
3. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
4. The changes to the plan can only be made if the previous plan was ‘unsound’ and the changes should explain how they will make the plan sound. I object to the absence of proper procedure, leaving an unsound plan not capable of being accepted.
5. I object to the fact that the council has failed to remove this site from the local plan despite receiving over 50,000 objections from local residents and statutory consultees.
6. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3
7. I object to the removal of additional 3.1 ha to be removed from the green belt without any justification
8. I object to the fact that the increased area, being on the south of the site facing the North Down AONB will increase the negative impact of the views from the AONB.
9. Opportunity (3) should be common to all sites and is not unique to this site
10. It remains unclear when and if the Ockham DVOR/DME beacon will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.

11. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.

12. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.

13. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)

14. It is further from railway stations than any other identified strategic site

15. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum. The Plan has not taken into account the associated daily traffic increase to and from the RHS as well as for the regular events at the RHS which attract 1000’s more visitors several times a year.

16. It is the least sustainable strategic site identified in this version and in previous versions of the plan because of the constraints on the site and the physical location.

17. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station

18. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)

19. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.

20. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station

21. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate despite talking of “good urban design”

22. I object to the increased area of the site as this now abuts and overlooks the Ockham Conservation Area.

23. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)

24. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact

25. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

26. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

27. I object to the Council wasting tax payers and residents’ time and money not following due process and in particular ignoring previous representations.

28. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

29. I object to the Housing number which is unsound and open to legal challenge.

30. I object to Policy S2 where it states: “4.1.9a The figures set out in the Annual Housing Target table sum to a total of 12,426 homes.” Yet the figures in the table add up to 9,810. The difference of over 20% demonstrates the lack of understanding of the housing requirements of the Borough. It is also an example of why the Plan is not sound.

For the reasons listed above and numerous other reasons I consider that the plan is unsound and not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/4240  **Respondent:** 10911617 / Peter P. Earle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Objections to Guildford Borough Council (GBC) Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM)

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brown field land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths, the lack of pedestrian footpaths and the space to provide either, together with the pitiful state of the existing highways, which are currently dangerous for cyclists
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and demand for car parking at each station is already at capacity.
- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
• I object to the fact that air quality concerns have not been taken seriously. Air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

• I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2341  Respondent: 10911617 / Peter P. Earle  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for a number of reasons including:

1. This is the least sustainable site identified in both the current and previous versions of the Local Plan because of the site constraints and location.
2. This site is further from railway stations than any other identified strategic site.
3. The site is adjacent to the most congested stretch of strategic road network (SRN) in the county and close to one of the most congested junction in the country (M25 -J10)
4. Local roads are at capacity particularly when the SRN is not free-flowing (in peak times and also due to accidents, diversions, roadworks etc)
5. Suggested public transport initiatives including bus services to and from Guildford will exacerbate the already over crowded road network leading to unreliability and delay, which in turn will make local residents choose individual modes of transport resulting in further congestion.
6. Public transport bus services to Horsley will reduce the safety of the local road network as lanes are narrow and this will increase danger to cyclists and walkers which should be encouraged as eco friendly alternatives. The area is greatly used by cyclists at all times throughout the year who seek to follow the 2012 Olympic cycle route and train for the annual Ride London –Surrey 100 cycle event. The current plan will add to traffic flows and endanger cyclists and walkers lives.
7. The proposed site is adjacent to the Royal Horticultural Society gardens, which is one of the most visited destinations in the south-east of the country. I understand that expansion plans the RHS have will significantly increase the number of visitors to Wisley. From reading the plan, the resultant traffic increase from the RHS has not been considered. Furthermore, there are regular events at the RHS which attract 1,000’s of additional visitors and again the impact of this increase in traffic does not appear to have been taken into consideration.

8. Once completed, there will be minimal employment opportunities on the developed site as a result of which, the majority of new residents will travel to work. The majority of these are likely to use motor cars (probably with only a driver) and this will add significant volumes of traffic to the already over crowded local narrow lanes.

9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.

10. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.

11. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”.

12. Opportunity (3) should be common to all sites and is not unique to this site.

13. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.

14. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

15. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16).

16. I object to the removal of additional 3.1 ha from the green belt without any justification.

17. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.

18. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.

19. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

20. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

21. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

22. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

23. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

24. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

25. I object to the extension of the plan period by 1 year as it has not been identified as a major change.

26. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

27. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

28. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

29. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

30. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

31. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

32. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

33. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

34. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.
35. I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development. I particularly object to the reliance on the Carter Jonas study update 2017 which includes “demand” for retail space from companies already in administration.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

Please note that I reserve my right to attend the inquiry and personally present evidence.

As a further over arching comment on local and government policy, I do not understand why more emphasis is not being given to long term investment in developing other parts of the UK. It is evident that the South East and the London conurbation in particular is over crowded. The answer is not to destroy the green belt but to encourage a shift in population to other areas which have been neglected by successive governments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2727  Respondent: 10911745 / S Hayley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford Borough Council Proposed Submission Local Plan: Letter of Objection

Although I live outside the borough I keep my horse at stables in the borough and regularly drive to the borough to ride my horse out over the Bridleways on the Former Wisley Airfield and local areas.

I write to OBJECT to the draft Submission Local Plan and the inclusion in the Plan as a potential site for development of the Former Wisley Airfield for the following reasons:

• I object to a plan with 70% of new housing in the Green There is ample brownfield land in the urban areas of the Borough. The Green Belt should be preserved for future generations as was reflected in election promises to preserve the Green Belt.
• I object to the housing number of 693 houses per year which is far too It is the result of hidden calculations and has not been justified.
• I object to the proposal to remove the Former Wisley Airfield (FWA) and neighbouring land from the Green There are no exceptional circumstances to warrant removing the land from the Green Belt
• I object to this urban 2,068 house development being placed in the historic rural village of 100 or so homes in
• I object to the impact on transport, local roads and road The proposed development would result in around 4,000 additional cars on the roads. This will increase the danger from traffic to horse riders, cyclists and pedestrians on the narrow rural roads in Ockham and the surrounding area. It will increase in the already very bad congestion on the A3 and M25.
• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, particularly the Thames Basin Heath Special Protection Area (SPA) and the Sites of Special Scientific Interest (SSSI) and Special Nature Conservation Interest (SNCI). I enjoy on the airfield the song of the skylarks, which are an endangered species, and which will be threatened by the development
• I object to the threatened loss of high quality farmland, currently covered by the fast growing maize crop.
Please remove the Former Wisley Airfield, site A35, from the Submission Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2039  Respondent: 10912385 / Berend Du Pon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Under the proposed Plan the identified boundary for the village is drawn between our house, [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998], and that of our neighbours at [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998], which is all of 6 ft from us, which seems perverse.

We would ask you to take another look, please, and request that our property be included within the 'Identified Settlement Boundary'.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3431  Respondent: 10912513 / Sarah Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the inclusion of policy A43 of 7000sq m of industrial warehousing as the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft. Slyfield Industrial Estate still has spare capacity and could accommodate any additional warehousing need if required.

2. I object to the number of 693 new houses proposed in the Local Plan for each year. The numbers calculated in accordance with the SHMA do not reflect true local need and have been inflated by the way students, economic need and affordability have been calculated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3847  Respondent: 10912513 / Sarah Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to all sites in West Horsley for over 5 homes. The proposed sites will merge the villages of Oakham, West and East Horsley creating urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6686  Respondent: 10912513 / Sarah Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the inclusion of the planned development of 2000 houses at Gosden Hill Farm, Merrow (Policy A25) in clear contravention of the Government’s and Conservative councillors’ election manifesto promises to protect the Green Belt. I object to the unsustainable nature of the site, the poor air quality and noise pollution levels that will result and the infrastructure deficit that will result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I object to the inclusion of Three Farm Meadows (Policy 35) due to the proposed removal of the site from the Green Belt when no exceptional, very special or special circumstances exist. In particular, I object to the unsustainable nature of the site, the poor air quality and noise pollution levels that will result, the infrastructure deficit that will result and the impact on views to and from the Surrey Hills.</td>
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<td>1. I object to the building of 45 houses at Clockbarn Nursery, Tannery Lane (Policy A42) on the grounds of inadequate access to and from the site. The roads surrounding the site are already hazardous, narrow and windy. Tannery Lane has already had planning permission granted for 64 houses and a marina and the location will not be able to cope with any more traffic.</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6685  Respondent: 10912513 / Sarah Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the inclusion of land at Garlick’s Arch, Burnt Common and the proposed 400 houses and 7000 sq m of industrial warehousing on that site (Policy 43). Policy A43 and A43A were included at the last minute. They were not in the Regulation 18 draft and had not been consulted upon prior to the inclusion 2016 Local Plan
2. I object to the unsustainable nature of the site at Garlick’s Arch (Policy 43).
3. I object to the impact of Policy A43 on ancient woodland on that site, on noise pollution and air pollution levels. The site is also prone to flooding.
4. I object to the impact of Policy A43 and A43A on local infrastructure. Congestion levels on A247 are already increasing at an alarming rate and will be further exacerbated by the development of Garlick’s Arch as the residents will have to rely on the use of private cars.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7200  Respondent: 10912513 / Sarah Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of land at Garlick’s Arch, Burnt Common and the proposed 400 houses and 7000 sq m of industrial warehousing on that site (Policy 43). Policy A43 and A43A were included at the last minute. They were not in the Regulation 18 draft and had not been consulted upon prior to the inclusion 2016 Local Plan.

1. I object to the unsustainable nature of the site at Garlick’s Arch (Policy 43). I object to the impact on residents that the resulting noise pollution of Policy A43A will have.
I object to the impact of Policy A43 on ancient woodland on that site, on noise pollution and air pollution levels. The site is also prone to flooding.

I object to the inclusion of policy A43 of 7000sq m of industrial warehousing as the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft. Slyfield Industrial Estate still has spare capacity and could accommodate any additional warehousing need if required.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6684  Respondent: 10912513 / Sarah Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the creation of a new 4 way interchange onto the A3 on the A247 (Policy A43A) as this would add to the ever increasing levels of traffic on the A247, A3 and through Send and Clandon. Send would become a through route to and from the A3 and will become gridlocked all day.
2. I object to the impact that Policy A43A will have on the air quality for those living in the surrounding areas and for future generations.
3. I object to the impact on residents that the resulting noise pollution of Policy A43A will have.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7199  Respondent: 10912513 / Sarah Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the creation of a new 4 way interchange onto the A3 on the A247 (Policy A43A) as this would add to the ever increasing levels of traffic on the A247, A3 and through Send and Clandon. Send would become a through route to and from the A3 and will become gridlocked all day.

1. I object to the impact that Policy A43A will have on the air quality for those living in the surrounding areas and for future generations.
I object to the impact of Policy A43 and A43A on local infrastructure. Congestion levels on A247 are already increasing at an alarming rate and will be further exacerbated by the development of Garlick’s Arch as the residents will have to rely on the use of private cars.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7201  Respondent: 10912513 / Sarah Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the impact of Policy A44 on an area of beautiful Green Belt countryside.
2. I object to the impact of Policy A44 as the subsoil of the existing site contains documented unsafe land fill waste which is currently vented.

I object to the impact of Policy A44, which includes 2 Travellers’ Pitches, on the local infrastructure. The narrow width single track country road provides insufficient access for the pitches.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16136  Respondent: 10912513 / Sarah Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Following the approval of the revised Local Plan by the full council of Guildford Borough Council on 24th May, I object to the provisions set out in the Local Plan as they threaten to destroy the established nature and identity of our villages by building on Green Belt land and will add considerably to the already unacceptable levels of traffic on the A3, A247 and M25 and many other roads in the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16139  Respondent: 10912513 / Sarah Green  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that insufficient consideration has been given to the harm that will be caused to the Special Protection Area, the Sites of Special Scientific Interest and the borough’s Conservation Area and heritage assets.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14033  Respondent: 10912513 / Sarah Green  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the impact of further congestion on local village roads and lanes.
2. I object to the impact that additional residents will have on local roads, health services, education spaces and policing needs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16143  Respondent: 10912513 / Sarah Green  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the impact that additional residents will have on local roads, health services, education spaces and policing needs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/16137  Respondent: 10912513 / Sarah Green  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the impact of further congestion on local village roads and lanes.
   
   I object to the impact of excessive development on the A3 and M25 on air quality. The air quality in many parts of the borough is greater than EU permitted levels and will damage the health of residents and future residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14035  Respondent: 10912513 / Sarah Green  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the inadequate protection of the environment.
   
   2. I object to the fact that insufficient consideration has been given to the harm that will be caused to the Special Protection Area, the Sites of Special Scientific Interest and the borough’s Conservation Area and heritage assets.
   
   3. I object to the impact of poor air quality on the Special Protection Area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16140  Respondent: 10912513 / Sarah Green  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the impact of poor air quality on the Special Protection Area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14036  Respondent: 10912513 / Sarah Green  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the erosion of the Green Belt in clear contravention of the Government’s and Conservative councillors’ election manifesto promises to protect the Green Belt. In particular, I object to Send being removed from the Green Belt (Policy P2) as Send provides a buffer between Woking and Guildford.
2. I object to the insetting of Ripley.
3. I object to the insetting of West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16141  Respondent: 10912513 / Sarah Green  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the erosion of the Green Belt in clear contravention of the Government’s and Conservative councillors’ election manifesto promises to protect the Green Belt. In particular, I object to Send being removed from the Green Belt (Policy P2) as Send provides a buffer between Woking and Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14032  Respondent: 10912513 / Sarah Green  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Following the approval of the revised Local Plan by the full council of Guildford Borough Council on 24th May, I would like to make it clear that I object to the provisions set out in the Local Plan as they threaten to destroy the established nature and identity of our villages by building on Green Belt land and will add considerably to the already unacceptable levels of traffic on the A3, A247 and M25 and many other roads in the borough.

I object to all sites in West Horsley for over 5 homes. The proposed sites will merge the villages of Oakham, West and East Horsley creating urban sprawl.

I object to the allocation of sites in unsustainable locations.

I object to the failure of Guildford Borough Council to include the Town Centre Masterplan 2015 in the Local Plan and to find sufficient brownfield sites for development prior to considering sites within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the fact that 70% of the proposed 13,860 houses are designated on Green Belt land along the A3. This will result in gridlock on the A3, the A247 and the surrounding roads which are already at capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16142  Respondent: 10912513 / Sarah Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the allocation of sites in unsustainable locations.

I object to the failure of Guildford Borough Council to include the Town Centre Masterplan 2015 in the Local Plan and to find sufficient brownfield sites for development prior to considering sites within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3467  Respondent: 10912513 / Sarah Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to changes relating to policy A43 Garlick’s Arch because:

- Again you have ignored the thousands of previous objections.
- There are no “exceptional circumstances” required to develop on this Green belt.
- It will generate excessive traffic along the Clandon Road with associated noise and light pollution. This will be made even worse if the adjoining Policy A58 is implemented.
- It would appear that there is no demand for Travelling Showpeople plots.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3504  Respondent: 10912513 / Sarah Green  Agent:
<table>
<thead>
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<th>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</th>
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- It would appear that there is no demand for Travelling Showpeople plots.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp172/3502   Respondent: 10912513 / Sarah Green   Agent:</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I object to changes relating to Policy A58 Burnt Common because
- This Policy was deleted from the 2014 Plan following previous objections.
- Additionally I see the Plan now references ‘Minimum’ rather than the original ‘Maximum’ referring to the 7,000 sq feet of industrial or warehousing. If the original proposal was deleted again I see no reason why the changed plan actually increases the proposed level of development.
- The impact on the Clandon Road and adjoining roads will create huge traffic issues, and noise and light pollution issues.
- There is no need to develop on this section of Green Belt land when other local sites including Slyfield and Guildford have empty existing sites and ‘brown field’ sites amiable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp172/4354   Respondent: 10912513 / Sarah Green   Agent:</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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- The impact on the Clandon Road and adjoining roads will create huge traffic issues, and noise and light pollution issues.
- There is no need to develop on this section of Green Belt land when other local sites including Slyfield and Guildford have empty existing sites and ‘brown field’ sites amiable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a resident of Clandon Road, Burnt Common, I find it incredible that GBC have failed to listen to the residents of Send and Burnt Common who previously in force have objected to the proposed Local Plan. Instead, it seems to have made further changes that result in more development rather than less, failing in the duty of GBC to listen to residents.

It seems that you are simply ‘testing’ the patience of residents by repeatedly making further changes without realising that your proposals are completely unacceptable. It is unjust that you are focussing a disproportionate level of development in and around the Burnt Common and Send compared with our areas of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID:</th>
<th>PSLPS16/2557</th>
<th>Respondent:</th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Dear Sirs

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.

• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and a further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
  6. The lack of suitable public The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M2S/A3 junction, is in excess of EU-permitted levels. Additional traffic will
exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

- I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.

- Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will mean either major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.

- Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1242  Respondent: 10912705 / Tim Williams  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY A36: Hotel, Guildford Road

Policy A36 proposes to re-develop the current Thatcher’s Hotel for housing. EHPC is concerned about the loss of this long-standing village hotel and significant employer. However, assuming that the employment loss can be justified, (which is a condition of Policy A36), and that full consideration of the safety implications of the development being sited on a dangerous corner of the A245, then a housing development at this location, providing it is done in a manner that is in keeping with its prominent landmark position at the entrance to the village, is acceptable.

The site is also close to the East Horsley Conservation Area and housing designs and site configuration must reflect the sensitivity of this setting. My principal concern is over the number of houses proposed for this site - approximately 48 dwellings. This number gives an implied gross housing density of 37 dwellings per hectare, which is exceptionally high for this location. The average housing density across the East Horsley Settlement Area is 8.1 dwellings per hectare and the highest density found in any of the roads around this location is 13 dwellings per hectare. Development at this location would only be acceptable if it has a significantly lower housing density.

POLICY A39: Land behind Ockham Road North, near Horsley railway station

Policy A39 proposes a housing development of some 100 dwellings on a 5.7 acre green-field Green Belt site behind the houses on the western side of Ockham Road North. Access is to be secured by demolishing the first two houses next to the railway bridge. As mentioned in an earlier comment, I consider that the proposed western movement of the settlement boundary needed to bring this site within the settlement area is unjustified and contrary to NPPF rules. If this boundary movement is invalid, as I believe, then this site remains a part of the Metropolitan Green Belt. As such and with no ‘very special circumstances’ to justify housing development upon it, I object to Policy A39.

POLICIES A37, A38, A40 & A41, located in West Horsley

The LAA identifies six sites in West Horsley for potential development, the four largest having allocation policies within the Proposed Submission Local Plan. The total housing number arising from these six sites is 405 homes in total. For a village which had 1,124 dwellings at the 2011 Census, this represents a proportional increase of 36% over the plan period, an enormously high proportion by any standards. The four policy sites are all located within the Green Belt. One is a partly brownfield development but the other three sites are all open fields used for agriculture and all lie within the current Green Belt at the edge of the Settlement Area. The reasons presented by the consultants, Pegasus, in the Green Belt & Countryside Study to justify these settlement boundary movements appear to be highly questionable and in no way to meet the requirements of the NPPF that such boundary movements are only to be made in ‘exceptional circumstances’. These movements clearly represent a deliberate pushing back of settlement boundaries in order to provide more greenfield sites for housing development. As such, I consider these proposed movements in settlement boundaries to be invalid. These proposals are also contrary to the principles of the Metropolitan Green belt. West Horsley represents one of the first ‘lines of defence’ against London urban encroachment outside of the M25 circle. Yet these policies will eliminate a significant part of this defence as they seek to expand the boundaries of this village and fill-in every bit of green space within this rural setting. It is also totally contrary to the opening statement of Local Plan Policy P2 that “We will continue to protect the Metropolitan Green Belt” It seems that in West and East Horsley at least the draft Local Plan is doing exactly the opposite. Given the scale of the development proposed in West Horsley, the inevitable destruction of its village character and the impact on infrastructure across West and East Horsley, I object to the site allocation policies A37, A38, A40 and A41.

POLICY A35: Land at former Wisley Airfield Policy

A35 proposes approximately 2,000 homes to be built on the site of the former Wisley Airfield. This will lead to the creation of the largest settlement in Guildford Borough outside of Guildford town. In effect it is proposing to create a New Town in the heart of the Surrey Green Belt. I have major concerns about this proposed development and have objected against prior planning applications at this location. I consider this proposed development to be a severe contravention of Metropolitan Green Belt policy. It will result in a New Town being created of very low sustainability which will have a major adverse impact on infrastructure across a widespread area, including East Horsley. Above all it will cause irreversible destruction to the character of one of the most picturesque and historic areas of the country. I strongly OBJECT to Policy A35.

I endorse the detailed submission of East Horsley Parish Council outlining their arguments against this policy, which has been supplied to GBC in a separate letter.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/2481  **Respondent:** 10912705 / Tim Williams  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to the Policy P2 in respect of insetting East Horsley from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/2471  **Respondent:** 10912705 / Tim Williams  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

It is illogical that Effingham Junction Station should be denied the status of Public Transport Interchange.

Effingham Junction Station (EJS) is within the envelope of the village settlement and will remain as such under the draft Local Plan. It is not "isolated" or "away from the village centre." Effingham Junction (the area immediately south and west of EJS, served by respectively Forest Road south of the railway bridge and Old Lane) is a thriving community with a significant population and also a significant number of active and successful employment floorspaces and sites. These include in Forest Road a general store (Forest Road General Store), a car sales and car repair business (PJB Car Sales/The Body Shop), a dental health centre and chiropractic clinic (Mortiboys) and on Horsley Road, Cedar Garden Centre, Royce Turf and Irrigation and at the Newmarsh Farm site, a number of businesses including Richmonds Horse Transport, Braye Hydraulic Repairs and TTS Surfacing Ltd. It is therefore vital that the Local Plan's economy policies affecting the area protect these spaces and sites and create conditions for their sustainable growth and hence job creation. Since all or most of these businesses are located within 500 meters of EJS, Policy E2 would be an invaluable driver for such growth which could play a major role in ensuring that Effingham Junction maintained and enhanced its position as East Horsley's "third centre" for homes and jobs. On the other hand, to exclude EJS from PTI status could very well stifle its sustainable development and condemn it to a future as a dormitory "backwater" of East Horsley. It is also counter-intuitive in the extreme to refuse EJS "PTI" status. This is for the simple reason that EJS is clearly a "public transport interchange" as that term would be normally understood. This is for the following reasons:
1. as the name "Effingham Junction" indicates, EJS is at an important junction and interchange. The railway line from Guildford splits here into two lines which take different routes into London, so many London-bound passengers will change trains here;
2. EJS serves not only the Effingham Junction area, but also the many residents of Effingham and Little Bookham for whom EJS is far closer than Bookham Station;
3. EJS also serves the many residents of the Cobham area for whom EJS is far closer than Cobham and Stoke d'Abernon station EJS also serves the residents of Ockham and Ripley;
4. EJS also serves the considerable numbers who visit local leisure activity sites, including three paintball sites and two clay pigeon shooting sites, for whom EJS is the only viable public transport hub; and
5. EJS will be the nearest railway station to the land at the former Wisley Airfield site which is proposed for the building of 2000 homes under Policy A35 of the draft Local Plan and if, despite the objections of many including East Horsley Parish Council, this proceeds, then significant numbers of residents will be taking one form of travel to EJS and then interchanging onto the railway.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2487  Respondent: 10912705 / Tim Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The detailed infrastructure proposals for Guildford Borough give cause for concern. There are serious deficiencies and shortcomings in the infrastructure of Guildford Borough as it is today and the aggressive housing policy as proposed by GBC in the Proposed Submission Local Plan will exacerbate this problem.

I would make the following comments specifically about infrastructure in East Horsley today:

• Roads across the parish are in poor condition with many potholes. Many roads are unable to sustain their current levels of traffic, particularly the increasing levels of HGV traffic;

• The principal through roads traversing East Horsley are narrow and winding, have a series of pinch points, have sections without any pavements and are generally unlit. As a senior SCC councillor remarked at a recent public meeting in the village hall: “East Horsley has lanes, not roads.” East Horsley’s ‘lanes’ are totally unsuitable for high volumes of traffic, in particular for the volume of HGV’s now using them;

• Many of the drains are blocked or otherwise in poor condition giving rise to frequent surface water flooding when it rains;

• The pavements are in poor condition. As well as being narrow, they are often uneven and/or cracked making it difficult, for example, for people with pushchairs or prams or in wheelchairs;

• There are insufficient school spaces for the number of local children needing them, with the result that children are often allocated to schools a significant distance away such as Dorking or Woking; and

• The Medical Centre in East Horsley is already at capacity in terms of its number of patients.
It is recognised that, as stated in the Proposed Submission Local Plan, the maintenance of adequate infrastructure and its expansion to meet growing needs is the responsibility of the relevant infrastructure provider. This is often not GBC itself but rather, for example, Surrey County Council or utility companies.

In respect of East Horsley, there are only two specific proposals in Appendix C:

**LRN 25 - East Horsley and West Horsley traffic management and environmental improvement scheme.** It is not clear what is proposed here, and its timing and funding have to be considered uncertain. It is stated that funding will, at least in part, come from developer contribution. However, it is not at all clear what development is likely to give rise to such a contribution, but it certainly implies that funding could only come if there were a development; and

**HSC 5 - Expansion of East Horsley Medical Centre to provide additional capacity and services for future population in years 5 – 15 of the plan.**

There are no proposals in respect of all the existing problems with for example roads, pavements, drainage, and schools. Furthermore, it is inevitable that the proposed developments in East Horsley itself and nearby, particularly in West Horsley and the proposals for Wisley, will put further strain on the existing infrastructure. There are no proposals at all to cater for this.

Although an expansion of the Medical centre is proposed in the Infrastructure Schedule, this is not until years 5 – 15 of the Plan. Given that it is already at capacity, this needs to be done earlier.

Local primary schooling is also a very pertinent issue. There are 11 housing development sites identified in the LAA for East and West Horsley, which taken together would result in the building of 593 new houses in the two parishes that are today served by a single primary school - The Raleigh, in West Horsley. Planning guidance suggest that this number of new homes will require the provision of around 150 additional primary school places to accommodate such an increase in population. Today there is no spare capacity at The Raleigh, yet no proposals are made in the Proposed Submission Local Plan to provide for any more schooling in the Horsleys.

The failure to address the inadequacies of the existing infrastructure to meet the needs of what is there already is a serious deficiency in the Proposed Submission Local Plan. I therefore object to the infrastructure proposals on these grounds, and to the proposals for infrastructure in that they do not meet the stated objective of providing infrastructure to support the proposed developments.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
East Horsley is set in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving that character. Moreover, being ‘washed over’ by the Green Belt has not been a serious constraint on development within the village. For example, GBC’s planning records indicate that no less than 149 net new homes were added to the village housing stock through in-filling and brownfield developments between 2000 and 2015. GBC attributes the need to inset East Horsley to NPPF requirements, arguing that the test for remaining ‘washed over’ is that the village should make an important contribution to the openness of the Green Belt. It is clear that East Horsley clearly does make an important contribution to the openness of the Green Belt. No less than 36% of East Horsley is composed of woodlands, whilst inside the settlement area there is an average housing density of just 8.1 dwellings per hectare (‘dph’). Woodlands and large residential gardens make a vital contribution towards biodiversity, provide wildlife corridors, and furnish those open spaces which are vital to the character of the greenbelt. It is one thing for a planner to study a map and see a settlement area filled with housing, but it is quite another actually to come to a rural village like East Horsley and see how the Green Belt has preserved the rural character and openness of this village.

Today East Horsley is a picturesque and flourishing rural community, which has and continues to experience steady incremental growth as a result of being ‘washed over’ by the Green Belt. As the saying goes: “If it ain’t broke, don’t fix it”. This applies to East Horsley in the matter of insetting, I therefore OBJECT to the proposal to inset East Horsley from the Green Belt and request that this proposal be dropped from the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2470  Respondent: 10912705 / Tim Williams  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Paragraph 4.3.16 and Proposals Map: Settlement Boundary changes in East Horsley

GBC are proposing to make a number of changes to the settlement boundaries of East Horsley and so expand the settlement area, as set out in the Proposals Map, with the justifications seemingly provided in the Green Belt & Countryside Study prepared by the consultants, Pegasus.

I object to two specific boundary changes, which have been proposed, as follows:

i) There is a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Ockham Road North up to the eastern boundary of Lollesworth Wood. This proposal removes over 5 hectares of agricultural fields from the Green Belt. The present boundary line is clearly defined by a deep and well-maintained drainage ditch which is classified by the Environment Agency as a ‘main river line’ and therefore represents a highly defensible Green Belt boundary. Moving this boundary west to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. I do not believe this proposal can be considered as an exceptional circumstance. Clearly the only justification for this change is to bring a large agricultural field within the settlement area in order to provide more housing land. However, under NPPF rules this is not a sufficient justification for changing a Green Belt boundary. As such, I believe it is an invalid proposal. I OBJECT to this proposed boundary change.
ii) There is also a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Kingston Avenue up to a tree line running along the Parish Boundary at the western edge of Kingston Meadows. The result is to take all of Kingston Meadows out of the Green Belt. Kingston Meadows is the main public recreational space of East Horsley, comprising various sports facilities and playing fields. The present settlement boundary is clearly defined by a deep and well-maintained drainage ditch running along its eastern side. It therefore represents a very defensible Green Belt boundary. Moving this boundary westwards to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. I do not believe that this can be considered as an exceptional circumstance. As such I believe this is an invalid proposal. I object to this proposed boundary change.

In the Green Belt & Countryside Study and its accompanying Topic Paper, GBC justifies the need to make changes in settlement boundaries in order to meet unfulfilled housing need in the Borough. However, Green Belt rules make it clear that unfulfilled housing need is not normally considered to be ‘an exceptional circumstance’. If it were the entire Green Belt would already be covered in tarmac. The NPPF is clear that every movement in settlement boundaries must be justified by ‘exceptional circumstances’. GBC have offered only a generic justification in their Topic Paper of meeting unfulfilled housing need, but a case by case justification has not been provided. As such, I believe the settlement boundary changes referred to above (and many others) are invalid without such detailed justification.

Paragraph 4.3.17: Proposal to remove Wisley Airfield from the Green Belt

I object to the proposal to remove Wisley Airfield from the Green Belt. The only justification for this proposed change is unfulfilled housing need which is not considered an exceptional circumstance.

POLICY P2: Limited In-filling

A new planning designation has been introduced called ‘the identified boundary of the village’. For East Horsley this covers a number of roads south of the A246. It is a sizeable area, covering 45 hectares, the equivalent of 23% of the present Settlement Area of the village. Within this area, Policy P2 sets out proposals that would allow ‘limited in-filling’ within this boundary.

It is hard to reconcile the opening statement of Policy P2 that “We will continue to protect the Metropolitan Green Belt” with this sizeable reduction in effective Green Belt status. In my opinion, this policy represents a de facto extension of the Settlement Boundary and a substantial reduction in the operational effectiveness of the Green Belt, whose effectiveness is significantly weakened where this new planning designation applies. I object to the proposal to designate roads south of the A246 as being within the ‘identified boundary of the village’ and to allow limited infilling within this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The planned provision of 13860 new homes is in excess of the 10395 homes published in the Annual Housing Target table by 33%. This discrepancy is not explained in the documentation, represents an unjustified over-provision and is not sound.

From the SA report "Guildford Borough has not been formally asked by either of the two other authorities within the HMA to meet unmet needs arising from within their areas". Without evidence of co-ordination with other regions, it is difficult to see how this document complies with the Duty to Cooperate. Inflating Guildford Borough's OAN to meet an assumed unmet housing need in Woking and Waverley may be noble, but is unjustified without formal cooperation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1844  Respondent: 10913377 / Isabelle Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1842  Respondent: 10913377 / Isabelle Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object to the development at Garlick’s Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks’ notice and without any prior consultation and is not required in terms of housing need either for the village or the borough.

I object to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attachments:

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Comment ID: PSLPS16/1843  Respondent: 10913377 / Isabelle Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I also object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the (A247) would be gridlocked all day.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attachments:

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Comment ID: PSLPS16/1845  Respondent: 10913377 / Isabelle Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the development of 40 houses at Send Hill as this high quality Green Belt amenity within an area of beautiful countryside would be spoilt for ever. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attachments:

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Comment ID: PSLPP16/3990  Respondent: 10913377 / Isabelle Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3982  Respondent: 10913377 / Isabelle Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

I object as I cannot see that the building of houses and an industrial site on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill is justified by “any special circumstances”. Green Belt is supposed to be permanent and not continually eroded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3985  Respondent: 10913377 / Isabelle Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Objections to Draft Local Plan

I wish to object to the Draft Local 2016 Plan to remove the Green Belt villages of Send, Ripley and Clandon from Green Belt status as I believe this is being done for pure expediency.

In a letter by Housing and Planning Minister Brandon Lewis, the Government stated that “demand for housing alone will not change Green Belt boundaries”. Furthermore, National Planning Practice Guidance states that “unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the ‘very special circumstances justifying inappropriate development on a site within the Green Belt”.

I object as I cannot see that the building of houses and an industrial site on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill is justified by “any special circumstances”. Green Belt is supposed to be permanent and not continually eroded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3984  Respondent: 10913377 / Isabelle Stevens  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The “housing need” figure of 13,860 is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need. Students are only part time residents in Guildford needing one bedroom in shared housing units and I do not believe that they would want to live in houses in the surrounding villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3991  Respondent: 10913377 / Isabelle Stevens  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

I object because these housing developments and the proposed changes would change the nature of this beautiful area forever devaluing it for my generation and beyond. I believe that our villages are being dumped on in that we are being asked to accept a staggeringly high number of Guildford’s housing needs. Lastly, I do not feel that this need is evenly shared throughout the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPA16/1903</th>
<th>Respondent: 10913537 / Debbie Pinder</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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Having studied the "Draft Guildford Borough Local Plan – Strategy and Sites, June 2016” I write to you in objection to a number of the policies, herein stated below.

**Policy H1: Homes For All, Policy H2: Affordable Homes**

I object to the above policy. The proposed development of 531 homes over Green Belt sites in West Horsley is out of proportion with the current number of houses in the village. This is also completely out of character with the village with regards to style and layout, and is unsustainable on existing services and amenities. The village is served by one local convenience store, a part time newsagents, and one small MOT garage.

There is a very limited bus service, which runs through the village, and Horsley Station is already a busy commuter station hitting capacity for car and bike parking. The only school in the village, The Raleigh, is already oversubscribed and additional population would mean existing residents would be further stretched for places meaning traveling to other villages/towns for schools.
In addition, the West Horsley Parish Council 2014 Housing Survey indicated a requirement for merely 20 affordable houses for the young or elderly wishing to enter the housing ladder or simply down size. This contradicts the proposed 531 houses for the village.

**P2: Green Belt and the countryside**

I object to the proposal to remove West Horsley from the Green Belt. There appears to be no justification for insetting these Areas from the Green Belt so I object to West Horsley's Defined Settlement Area boundaries being extended. According to the National Planning Policy Framework, in order to build on Green Belt sites, there must be "exceptional circumstances". There are none stated for this particular case.

Building into the Green Belt area will change the character of West Horsley village. Land and green space will be lost, create damaging environmental changes, all of which increase the risk of West Horsley morphing into another busy, densely populated, concrete, suburban town. Building into the Green Belt area will change the environment with adverse, damaging and permanent affect and will have impact on the Surrey Hills AONB, which attracts a great number of visitors each year.

**Policy D4: Development in urban areas and inset villages**

I object to new developments in inset village, due to the fact the volume of proposed houses will not compliment nor respect the existing grain and pattern of the areas. The layout and scale will be completely disproportionate to the existing scale of the village. It will also have an overwhelming negative impact on the amenities and residents of the existing buildings.

**Policy A37: Land at and to the rear of Bell and Colvill, Epsom Road, West Horsley**

40 homes is unsustainable and unbalanced for this delicate and attractive environment in West Horsley village.

**Infrastructure and delivery**

The increased population would bring with it increased village traffic, higher requirements for public transport, and oversubscription for the local school which already runs to maximum capacity.

The volume of traffic through the village will be damaging on the noise levels and air quality, add increased risk and dangers on the roads, and will further add to the damage on the tarmac the residents already experience on East Lane. Both drivers, cyclists and pedestrians safety will be compromised. The children’s nursery Footprints on Longreach and the primary school on Northcote Road will be highly impacted with the increased volume of traffic with the proposed sites around East Lane. Plus, journey times would increase with the increased traffic on these narrow village roads.

The existing facilities already feel the pressure of the village population: the medical centre in East Horsley struggles to make appointments for the local residents; the drainage infrastructure already has a capacity issues, with overflow problems in the Ockham Road North/ Green Lane area; and the rail station runs to capacity with a daily full car park.

Thank you for considering my appeal and objections and I look forward to the response in the near future.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Green Belt

We object strongly to virtually any development within the Green Belt. Those who conceived the idea and implemented the necessary laws to create Green Belt around our major cities and towns in 1955 showed foresight and determination that Society, Politicians and vested interests today would be unable and unwilling to commit to. The whole concept of Green Belt land is 'genius' which much of the rest of the world envies us for. It represents only 13% of land in England but its immeasurable benefits have been cherished by all who live and work in its proximity and can only continue to be such an asset if its future is guaranteed for generations to come.

Green Belt is Green Belt and should not be considered as an asset other than as Green Belt, it is irreplaceable. The laws that protect the Green Belt may well allow for 'Exceptional Cases' but these should be considered in extremis, land taken out of the Green Belt should be replaced elsewhere and in no circumstances should it be sacrificed 'to build houses'

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: pslp172/335</th>
<th>Respondent: 10913729 / Elizabeth Richings</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

Directs more office space to an extended business park (Policy E4), which will increase peak time congestion, particularly around the hospital and A&E which would only add to the current serious congestion of traffic in the area of the A3 and A31 and will affect existing residential areas. Currently in the morning peak traffic period there is severe congestion. This hospital is a Major Incident hospital and fast access must be maintained at all times.

I object to Blackwell Farm being included in this Plan as a development site (Policy A26 & Paragraph 4.1.9) which:-

Disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England's forthcoming boundary review (para. 4.3.8)

Ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development (2.1.4a)

In 2015 the National Farmers' Union expressed alarm that our ability to produce our own food and be self-sufficient had dripped from 80% in 1980 to 62%. This will drop to 53% by 2040. As world population grows there is no way that we should be building on good quality farm land. Especially commercial property. A recipe for disaster. Again you must listen to us.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPA16/2292</th>
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Thatchers Hotel site - too overcrowded for the area. More suitable for no more than three times the density of local council/right-to-buy as in adjacent Wellington Cottages. Also, road access, at school and work transit times needs to be thoroughly assessed.

St. Martins area, where I believe there is suggestion of traveller pitch/s, is a most unsuitable area due to adjacent sheltered housing and an elderly care home as well as the local bowling green. Also this road is almost the only car parking for the church (St. Martin's) opposite.

Ockham Road North - this on first impressions looks quite suitable, but not for such density. The main problem is the egress onto Ockham Road North adjacent to the railway arch. Visibility would be very constrained.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPS16/3072</th>
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Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:
1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5. I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25.
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

1. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

2. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

3. I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

4. I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC’s Planning Committee.

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.

2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.

3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.
After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/3843</th>
<th>Respondent: 10914689 / Natalie Bowden</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.
10) I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.
I hope that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
parking). Any new infrastructure proposed will not sustain the increase in traffic, let alone the pollution caused and lack of flood management in an area with thousands of already-unmanaged underground springs.

There are already huge traffic challenges in the Horsley villages. This would be heavily compounded by development of the Bell & Colvill site on the A246, East Lane, West Horsley, Thatchers Hotel site, and Ockham Road North. The last of these is in the centre of the lower village, which can hardly cope with too much traffic, a lack of parking and overcrowded public transportation.

The increase of up to 35% of new houses proposed for West Horsley is excessive for a rural area which has great historic significance. The impact on roads, schools, medical facilities, public transport and the environment would be devastating to the general area and detrimental to all residents.

In the long term, with development as has been proposed, the Horsleys and surrounding areas will become places to be avoided at all costs due to gridlock, flooding, pollution and lack of services. Ockham Road already suffers with oversized lorries using it as a means of getting to the A3, which makes it dangerous for other drivers and any pedestrian that dares to walk along the narrow footpath beside it. Bicycles easily block this narrow road, which is also used by drivers going well over the speed limit. Too much is being sacrificed to meet government objectives, which should be urgently reviewed and amended after the Brexit vote.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/465  Respondent: 10914721 / Taj Gilligan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

The extensive nature of this document, the jargon and complexity that acts as a barrier to most members of the public is unexcusable. We are not all lawyers or public servants who work with this kind of document as part of our employment. There is also the time required to respond in full, and adequate time has not been allowed for this to take place before the VERY SHORT deadline. Few have the spare time or head space to tackle a document such as this, and it should have been offered in a more inclusive way, so the public would have multiple options to respond matched with their abilities. The future of our borough will effect all of us, and especially our quality of life, yet there are many who will not be able to cope with the language, complexity and overcomplication of this consultation. Not all of us have a PhD!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4271  Respondent: 10914817 / Sandy Brook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
I strongly object to the inclusion in the Local Plan of the former Wisley Airfield site, A35, also known as Three Farms Meadows. I live in Cobham, outside the Guildford area, but close to Wisley and directly affected by what happens there. My reasons for objecting are as follows:

- The site is in the Metropolitan Green Belt and the proposed new town would severely affect the openness of the area and the views to and from the Surrey Hills AONB. There are no very special circumstances justifying this development. There are Brownfield and Urban sites still available in the Guildford area and these should be used.
- Development of the site would destroy this beautiful, quiet rural area and decimate the wildlife. It would overwhelm the hamlet of Ockham and the other little villages close to the site. It would create a ‘foreign body’ in the beautiful Surrey countryside. The intended density of dwellings and the four and five-storey buildings would be completely out of character with the area.
- There would be an unacceptable increase in light, noise, and air pollution plus an effect on the water table and flooding in the locality.
- The new population centre would place impossible strains on health services, schooling, public transport, and other facilities and infrastructure in and around the locality.
- There would be a dramatic impact on roads and traffic. As a resident of Cobham I am particularly concerned with the adverse impact the extra vehicles would have on junctions on the A3 and M25 and on the traffic jams we get in Cobham.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to building 400 houses and 7000 sq metres of industrial space at Garlick's Arch, opposite Send Marsh Road - The site is beautiful open fields and ancient woodland. It is a crime that Green Field sites such as this are proposed to be built on when Brown Field sites are not even being considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4253  Respondent: 10914849 / Robert Yates  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

I OBJECT to a new interchange with the A3 at Burnt Common - Send would have to take an increased volume of traffic from the A3 on its already heavily congested roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4252  Respondent: 10914849 / Robert Yates  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

I OBJECT to the development of 40 houses and 2 travellers pitches at Send Hill - This land is inappropriate for development due to the fact that it contains unsafe landfill waste, and this lane will also not suitable for more traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

The already oversubscribed local schools will not be able to accommodate such a huge influx of new pupils.
The Local Doctors surgery will not have the capacity to accommodate such a huge influx of new patients.
The already creaking Sewage system in Send will not be able to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Traffic will become gridlocked in Send, which is heavily congested already.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Traffic will become gridlocked in Send, which is heavily congested already.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Pollution from traffic fumes and noise will be detrimental to the health of the people of Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9105  Respondent: 10914849 / Robert Yates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Send Village being removed from the Green Belt. The Green Belt land in Send comprises of beautiful woodland and fields of long grass which support a rich myriad of wildlife. The Green Belt land not only provides a physical buffer between Send and Guildford to the South and Woking to the North, but even more importantly it is an environmental buffer against traffic pollution and noise, it is the 'lungs' of Send, helping to combat the air pollution. If Send were to lose the Green Belt to development it would have an irreversible and detrimental effect on the rural aspect of Send Village. The Councillors have reneged on their promise to protect the green belt, and there are no special circumstances to justify building on the green belt. Brown Field sites should be used to fulfill the housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9106  Respondent: 10914849 / Robert Yates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There are no exceptional circumstances to inset Send from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4475  Respondent: 10915041 / Balazs Hegedus  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I attended the meeting on 8th April regarding The Wisley Property Investments Ltd (WPIL) planning application of January 2015 (Ref: 15/P/00012) and this was unanimously rejected by GBC following the recommendation of the GBC Planning Officers.

The reasons for the refusal of the application were many but included that the proposed development:

(a) was an inappropriate development within the Green Belt;

(b) would have a clear and substantial detrimental impact on the openness of the Green Belt and conflict with the purposes of including land within the Green Belt;

(c) failed to demonstrate that the benefits amounted to very special circumstances such as to clearly outweigh the harm to the Green Belt and the other harm identified;

(d) failed to comply with the objectives of policy RE2 of the Guildford Borough Local Plan 2003 (as saved by CLG Direction dated 24/09/2007) and chapter 9 of the National Planning Policy Framework;

(e) was within the 0-400m and the 400m to 5km zones of the Thames Basin Heaths Special Protection Area, etc.

(f) would have a severe adverse impact on the safe and efficient operation of the strategic road network, and a severe impact on the efficient operation of the local road network;

(g) failed to deliver the required transport sustainability measures;

(h) failed to secure an appropriate provision of affordable housing;

(i) was detrimental to the viability and vitality of the existing district and local centres in the vicinity of the site;

(j) would result in loss of the safeguarded waste site;

(k) presented a dense and urban form of development owing to its quantum and scale;

(l) had an adverse impact on the setting and significance of a designated heritage asset;

(m) had an unacceptable air quality impact;

(n) impacted on education infrastructure;

(o) impacted on policing infrastructure;

(p) impacted on health infrastructure;

So I was completely baffled when we went to the next meeting at the GBC Millmead, on 24th May, to be told that they were going to go ahead with the plan anyway!! So why are we continually writing our objections when they are completely ignored?

Anyway, I object very strongly to the submission of the local plan, specifically for The Three Farm Meadows (the former Wisley Airfield). I could rewrite my objections from all my previous emails/letters, but I cannot see that they will make a difference!!
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<td>I would like to object to GBC’s Proposed Submission Local Plan unreservedly. As a local resident I have objected to all the proposals the GBC has put forward along with thousands of others in our area. It really is appalling that our objections have been completely ignored and the Local Plan has failed in the number of key areas to take into account or to answer our valid comments and criticisms submitted by thousands of residents and organisations in respect of the previous 2013 Draft Local Plan. What is the point of us all objecting whole-heartedly if we are just ignored. I have to say that in my opinion it raises questions about your governance and vested interests.</td>
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<td>OBJECTION TO GUILDFORD DRAFT LOCAL PLAN</td>
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<td>I wholeheartedly object to the revised draft plan which shows no substantiated evidence for providing the foundation for any sustainable future for our borough. This plan offers no convincing long term solutions to the problems that face future generations – and would be a noose round their neck rather than offering a progressive, forward thinking plan that addresses the changing needs of the borough.</td>
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<td>POLICY E1 – Meeting Employment Needs</td>
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<td>I OBJECT to this policy as there is insufficient infrastructure to support development of industry in rural areas. Employment needs must be met in urban areas or existing business parks.</td>
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<td>POLICY E5 – Rural Economy</td>
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<td>I OBJECT to this policy which is against the principal that local people should be consulted and listened to. The town council should not have permission to approve development without adopting the sequential approach.</td>
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</table>
POLICY E6 – The leisure and visitor experience.
I OBJECT to any development on the basis of tourism and visitor attractions. The countryside is a precious attraction – and we already have a thriving tourism base generated by National Trust, the Olympic cycling legacy, and many seasonal events and performances.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7218  Respondent: 10915361 / Judy Young  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E7 – Guildford Town Centre
I OBJECT to this policy. The retail landscape is irreversibly changing and Guildford town centre could lead the way in being a town centre that thrives and regenerates through judiciously combined residential use of the town centre with shopping and leisure opportunities. Guildford could lead the way in brownfield redevelopment and become pioneers for resourceful and effective modern living.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7206  Respondent: 10915361 / Judy Young  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H1 – Homes for all
I OBJECT to this policy which has not been adequately evaluated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7207  Respondent: 10915361 / Judy Young  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H2 – Affordable homes
I OBJECT to this policy as it will be unenforceable– therefore, greenbelt land would be lost without any achievable integrity in it’s aims.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H3 – Rural Exception Home
I OBJECT to this policy which could be exploited for unintended development. The exceptional circumstances need to be more tightly defined

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/7220</th>
<th>Respondent: 10915361 / Judy Young</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY I1 – Infrastructure and delivery
I OBJECT to this policy as it is inadequate in addressing the scale of insufficient infrastructure in greenfield sites. The problem does not lie on our strategic road network but on the small arteries through our villages. The capacity of these roads is inadequate for existing population and cannot accommodate any growth. In particular, West Horsley already has an unacceptable traffic situation especially around commuter and school journeys, with two overused roads where traffic pays no regard to speed limits. It is only a matter of time until there is a serious incident. These existing roads cannot support additional capacity.
POLICY I2 – Supporting the Department of Transport’s ‘Road Investment Strategy’

I OBJECT to this policy which has no reality attached to it and only adds to the congestion of the area without any guarantee of improvement.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

POLICY I3 – Sustainable transport for new developments

I OBJECT to this impractical plan which does not reflect the realities of life and the extent of inherent issues that exist within the current infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy P1 – Surrey Hills Area of Outstanding Natural Beauty
I object to the policy which is weak and does not offer sufficient protection for this area of outstanding beauty.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Policy P2 – Green Belt
I object to the proposal of new villages and infilling of existing villages which erodes Green Belt land. In particular in West Horsley, where ‘infilling’ is proposed outside the settlement boundaries. There is no justification for development of green belt when there are sufficient brownfield sites to meet the capacity required. Surrey is the most congested county in the country, and every effort should be made to reduce this by locating new housing needs in areas with adequate road networks and infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY P3 – Countryside
I OBJECT to this policy which gives an elevated protection to an area, more than the protection afforded to the Green Belt or Area of Outstanding Natural Beauty.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

POLICY P4 – Flood risk and water source protection zones
I OBJECT to this policy as it precludes the development of brown field sites where there would be capacity for improved flood resistance enabling development and urban regeneration that would in turn protect the surrounding countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

POLICY P5 – Thames Basin Heath Special Protection Areas
I OBJECT to this policy which offers no increase in environmental protection. Suitable Alternative Natural Greenspaces cannot be justified where development is then permitted on otherwise protected areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I outline my objections to the policies below:

POLICY S1 – Presumption in favour of sustainable development
I OBJECT to this impossible policy which fails to recognise that West Horsley has inadequate infrastructure, in particular the road network and transport capabilities to cope with development. This plan is unsustainable in rural areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>PSLPP16/7205</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY S2 – Borough Wide Strategy
I OBJECT to this policy on the basis that there is no substantiated evidence for the need for the scale of the development being recommended

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>10915393 / Laura Cheese</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings.

I object to the draft Local Plan for the following key reasons:

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars

b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads

c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements

d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)

e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest

f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted levels. Additional traffic will exacerbate this situation,
impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency. I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows) I am disgusted with the fact that it has even got this far. We need to protect the land around from developers who want to create massive villages in such a beautiful and natural area. It saddens me that we are destroying natures home.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5691  Respondent: 10915521 / Gail Freeman  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to the proposal to develop the Garlick's Arch, Burnt Common area near Ripley & Send. The plan is totally disproportionate to our already overstretched local amenities of schools, roads, doctors etc. The land is green belt and should remain that way. I also believe that the land is part of the flood defences for Send Marsh, particularly the Maple Road development where I live, and I strongly object to any proposal which endangers the welfare of me and my family.

Other sites in the nearby area are also green belt land and should remain that way. There are other brown field sites more suitable for this type of development , if it's needed at all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3722  Respondent: 10915681 / Karen Bushnell  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the local authorities plan to develop in East and West Horsley Green Belt areas and any Green Belt that they have a directive to protect that is within the councils boundaries. It's Guildford borough councils duty to protect our Green Belt, which is also a national Planning Policy framework requirement and that Green Belt is only used in exceptional circumstances.

I have yet to see Guildford Planning authority give a justifiable case and evidence of such exceptional circumstance, to use so much Green Belt land. I see no evidence that clearly shows that all brownfield and other sites have been completely scrutinised to the nth degree and that there is no other options to consider.

Guildford Borough Plan seems to believe that they can just change the Green Belt boundaries thus removing the status of areas of Green Belt to aid developments which are opposed by local committees it is supposed to protect and serve.

Thus this makes the proposed Policy 10: Green Belt and the countryside and Policy 8: Surrey Hills Area of outstanding Natural Beauty and the study's flawed. There is no sound case in changing due to exceptional circumstances the green belt boundaries.

Changing the Green Belt boundaries and developing large numbers of homes around Villages that have only a finite resources of limited shops, schools, transport links, roads and public services will change the character of many villages.

Clearly expansion plans to the villages of East and West Horsley are unsustainable and putting more pressure on Areas of Natural Beauty.

Policy 9: Villages & Major previously develop sites and policy 18: Sustainable Transport for new developments.

Where is the Evidence or Studies of "Can these villages sustain such growth without plans to improve the infrastructure required" If not where is the infrastructure upgrade plan.

I believe also in the plan there will be homes for all and affordable homes. Which is a good thing but the large amount of homes indicated on three Green Belt sites at a high density plan will change the character of the village. It will also put an ever increasing strain drainage, roads, schools, transport links, shops and parking. I also wondered how affordable this homes will actually be in this area.

I believe the number of homes for this area is over subscribed and that infrastructure should be vastly improved before any such numbers are thought about. Even the telecoms and broadband services are under strain and that super fast Surrey is still struggling to offer fast broadband to all its homes. All the schools seem to be full in the area. The infrastructure is clearly not going to be able to sustain the growth.

From the points and comments above to Guildford Borough Councils Local Development Plan for East and West Horsley I therefore object to all developments in the area proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3994  Respondent: 10915681 / Karen Bushnell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North
I wish to object to various points in the latest Guildford Borough Council local plan.

1) My first objection is to the proposed removal of the villages of East and West Horsley and other borough villages from the Green Belt. This would appear to be in contradiction to your section Policy: Pt 3 Our Vision and Ambition. This states "To protect and enhance the environment .......". The Green Belt is not Guildford Borough Councils to give away as it is for the benefit of existing and future generations of Londoners as well as local residents. I agree with Guildford Greenbelt Group that once it is gone it is gone forever.

2) I particularly object to the extent of proposed development of 533 new houses within the Horsley's. Our roads are already congested at peak times, it is difficult to park by our village shops, our Medical Centre and local schools are overstretched. We are unable to accommodate an increase in our population of this size.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7440  Respondent: 10915681 / Karen Bushnell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4) I object that a proposal for 2000 houses at Wisley Airfield ref A35 has been included in this plan again despite the very good reasons it was rejected in the 2014 consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7439  Respondent: 10915681 / Karen Bushnell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A36

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
3) My next objection is in particular to the proposed development of 48 houses on the Thatcher's site. Ref A36. This is adjacent to a conservation area and an area of historic interest. The new development would totally change the character of this area and obscure the views of Horsley Towers and obliterate the surrounding countryside on the edge of an AONB. This disregards your policy point under Environment 2. "To protect these areas of conservation.....". The A246 is already busy in this area with regular tail backs in each direction and difficulty finding a break in the traffic to pull out.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16550  Respondent: 10915681 / Karen Bushnell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5) I also object and question the proposal Policy E8 District Centres. I would argue that East Horsley does not meet the criteria of a District Centre as we do not have a large Supermarket and so should not be considered in this category, nor indeed do I desire the village to expand and develop to an extent as to be in this category.

Thank you for the opportunity to make my comments on the proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1005  Respondent: 10915777 / V.L. Goatley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the above-mentioned villages being withdrawn from the Green Belt as they provide an essential buffer from Woking and Guildford becoming one large conurbation. Central government and local councillors both gave election promises to protect the Green Belt from further erosion and have reneged on this.

I OBJECT most strongly to the development of Garlick's Arch opposite Send Marsh Road's junction with the Portsmouth Road for housing and industrial development. This is already a very busy junction. Slyfield would be a more suitable site for industrial development. Further housing would add to the already serious problem of lack of school places, would lead to even long waiting time for doctor's appointments.

I OBJECT to the proposed new interchange with the A3 at Burnt Common as this would greatly increase the traffic through Send and surrounding area.

I OBJECT to the proposed development of 40 houses and 2 travellers' pitches at Send Hill - this site is too near the cemetery and the site contains documented unsafe landfill waste. The roadway is single width providing insufficient access. (Again more houses would have an effect on schools and the Villages Medical Centre.)

I OBJECT to the proposed building of houses at Clockbarn Nursery. Again there is inadequate access as Tannery Lane is very narrow with many tight bends. Again, further houses would have a detrimental effect on schools and medical facilities.

I OBJECT to the inclusion of Wisley airfield site as it has already been rejected by Guildford Borough Council. The building of so many homes and the necessary infrastructure it would require would put an enormous strain on local roads and again facilities, schools, hospitals etc.

I OBJECT to the suggestion of 2,200 homes on Gosden Hill site at Glandon and Burpham. Again, this would require major infrastructure works and would greatly increase the volume of traffic on local areas of Glandon, Burpham, Ripley and Send.

All the suggested developments would require significant improvements to the A3 and local roads and would contribute to the destruction of our rural villages!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3808  Respondent: 10915905 / David Anness  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the scale of the development at Wisley, Garlick's Arch and Merrow because there is no provision for appropriate timely investment in infrastructure (Roads, Schools, Hospitals etc). Anyone living locally would confirm that the road infrastructure is inadequate now, never mind having to cope with the extra volumes resulting from the Proposed Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

**Comment ID:** PSLPA16/3807  **Respondent:** 10915905 / David Anness  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of evidence and justification for the housing need numbers. These cannot be based on any sensible analysis of local demand.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPA16/1319  **Respondent:** 10915905 / David Anness  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the removal of Send and other villages from the Green Belt and to any of the developments which reduce the current Green Belt I thought we had a government commitment to defend the Green Belt and overwhelming local opinion, expressed in the Council elections, supporting the retention of the Green Belt.

2. I object to the lack of evidence and justification for the housing need numbers. These cannot be based on any sensible analysis of local demand.

3. I object to the scale of the development at Wisley, Garlicks Arch and Merrow because there is no provision for appropriate timely investment in infrastructure (Roads, Schools, Hospitals etc). Anyone living locally would confirm that the road infrastructure is inadequate now, never mind having to cope with the extra volumes resulting from the Proposed Plan.

4. I object to in particular to the scale of development at Garlicks Arch and Merrow which will produce significant extra traffic volumes into and from Woking via Send Road and Potters Neither of these roads can safely or effectively handle increased traffic flows.

The objections above demonstrate a democratic deficit between the views of the local population and the unjustified scale of development in the Proposed Plan which places no value on existing amenity (i.e. Green Belt) and contains no practical plans for infrastructure enhancement.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3806  Respondent: 10915905 / David Anness  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of Send and other villages from the Green Belt and to any of the developments which reduce the current Green Belt boundaries. I thought we had a government commitment to defend the Green Belt and overwhelming local opinion, expressed in the Council elections, supporting the retention of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7167  Respondent: 10915905 / David Anness  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to in particular to the scale of development at Garlicks Arch and Merrow which will produce significant extra traffic volumes into and from Woking via Send Road and Potters Lane. Neither of these roads can safely or effectively handle increased traffic flows.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2371  Respondent: 10915905 / David Anness  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

On Policy A44. 1.9a LAND WEST OF WINDS RIDGE AND SEND HILL

1. I object to the proposal on the grounds that Send Hill is in part a single track country road and too narrow, particularly at the Potters Lane junction, to accommodate the extra traffic the proposed development would bring.
2. I object to the proposal on the grounds that Send is in Green Belt. The proposed inset is inappropriate due to its permanent green belt status.
3. I object to the proposal on the grounds that the existing roads and parking infrastructure is already inadequate and could not cope with the extra traffic.
4. I object to the proposal on the grounds that the proposed development site (A44) was used as a GBC registered landfill site. Disturbance of the site would be a health hazard due to the unknown materials in the site.
5. I object to the inclusion of Traveller Accommodation in Send Hill due to the disturbance to an existing community. If significant development is in prospect then Traveller Accommodation should be planned as an integral part of such new development (as for affordable housing) rather than imposed on an existing community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7168  Respondent: 10915905 / David Anness  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

On Policy A44. 1.9a LAND WEST OF WINDS RIDGE AND SEND HILL

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2. I object to the proposal on the grounds that Send is in Green Belt. The proposed inset is inappropriate due to its permanent green belt status.
3. I object to the proposal on the grounds that the existing roads and parking infrastructure is already inadequate and could not cope with the extra traffic.
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<td>The objections above demonstrate a democratic deficit between the views of the local population and the unjustified scale of development in the Proposed Plan which places no value on existing amenity (i.e. Green Belt) and contains no practical plans for infrastructure enhancement.</td>
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<td>I write with regards to the Horsley's and Wisley airfield development proposals. I understand you used a consultant to come up with the numbers of housing required which did not provide its model of how they came up with their figures. I also understand that the council increased the consultants figures which is almost 70% higher than the official national estimates for population growth in the Borough. I doubt the veracity of these figures you are basing these proposals on and would ask, in light of the BREXIT vote that you reconsider the long term housing needs for the entire Borough.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): (No)</td>
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I am not a lawyer but I understand that the council has to prove exceptional circumstances to take land out of the Green Belt regulations and I have not seen this demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/603  Respondent: 10915937 / Rona Lester  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I re-consider you plan to see how such a small village can absorb so many new houses/people. No reasons have been given for the extension of the settlement area boundaries (taking them outside the Green Belt). It seems that you are only proposing this to increase the land available within the settlements for future additional development.

Infrastructure is already overloaded, schools, Doctors surgery and the roads/rail links. I don't believe you have made these proposals with enough or very little thought of how or where there would be scope to improve the infrastructure.

Station Parade you are designating as a district centre. This classification I understand is misreading the nature of the facilities provided in the village and would be inappropriate to target this for more urban development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/606  Respondent: 10915937 / Rona Lester  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)
I feel like noone is listening to us at the council. We have objected before and now having to do it all over again with not a lot of changes to the OTHER plan. HOW can you call this co-operation? I thought the Wisly Airfield had been struck off the plan and now I find it is back AGAIN. How can this be co-operating with the local people if you just come back again and again with what seems like the same proposals.

The development of 2,000 homes (almost the same size as Horsleys today) in Wisley is a totally impractical option. (as has been brought to your attention many time before. The impact on the Horsley villages is SO huge and overpowering that it will change the villages forever. It is only 2 miles from us and will have impact on the railway stations (already overcrowded parking) and other amenities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/608  Respondent: 10915937 / Rona Lester  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

No

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/611  Respondent: 10915937 / Rona Lester  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I hope you have a detailed look at your reasons for taking Green Belt land out of the Green Belt and tell us what the exceptional circumstances are. Consider the SIZE an 'new village' in Wisley will have on the local infrastructure. Relook at your overall population assumptions in light of BREXIT and your own consultants figures. Once you have done this, it cannot be undone.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Comment ID: PSLPS16/7357  Respondent: 10915969 / Lesley Dorran  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

Garlicks arch  

I strongly object to this development.  

The council have not taken into account the feelings of local residents and have not made it easy to raise any objections.  

The local infrastructure has not been taken into account, in particular the greater amount of traffic which will be generated on local roads. Send marsh road already has an enormous amount of traffic during the rush hour which includes heavy goods vehicles that are totally unsuitable for a road of this width. This is obviously due to sat nav systems. The council and police have already been put on notice that unless traffic calming measures are put in place this is a fatal accident waiting to happen.  

Garlicks arch is a very necessary open piece of land protecting and enhancing our environment.  

Guildford borough council states that they will engage in a considerable amount of public engagement but in this case they seem to have been sadly lacking  

There seems to be a disproportionate amount of development within small areas ie ripley/send/clandon as compared to other areas within guildford.  

The council state that they will protect and enhance our natural environment. I fail to see how the development of garlicks arch will achieve either of these objectives  

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: PSLPP16/2246  Respondent: 10915969 / Lesley Dorran  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I object to policy 4.3.13 which removes certain villages from the green belt.  

The green belt is in place to protect our villages from overdevelopment and to retain the rural feel.  

The council have made little effort to keep those affected by this policy well enough informed.
The infrastructure and road system will not be able to cope with high density infilling within these villages.

The Localism Act has not been taken into account.

Rather than spoiling the look and feel of historic villages, which once lost can never be regained, development would be better suited in more urban areas and on brownfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2796  Respondent: 10916193 / Ann and David Harrison  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. The housing targets for the whole of the Guildford Borough seem very unreliable and excessive.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/369  Respondent: 10916193 / Ann and David Harrison  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The possible development at Wisley Airfield, along with other local proposals, will put an unreasonable strain on local facilities – transport, traffic, parking, schools and medical facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5781  Respondent: 10916193 / Ann and David Harrison  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
2. There is not the infrastructure in place or satisfactorily planned to cope with the proposed developments, particularly if the plans to develop Wisley airfield go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/788  Respondent: 10916193 / Ann and David Harrison  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. There is an excessive amount of housing proposed within the Green Belt. We should be trying to avoid the area becoming just another outer London urban sprawl.

1. The removal of East and West Horsley from the Green Belt is not acceptable. We should be protecting Green Belt areas and concentrating development on brownfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11725  Respondent: 10916193 / Ann and David Harrison  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am not happy with a number of areas in the new Local Plan and would like to object as follows:-

1. I do not approve of the removal of East and West Horsley from the Green Belt - we should be trying to protect these areas of outstanding natural beauty.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. The housing targets for the whole of the Guildford Borough area are over the top and unreliable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- destroy views from the Hog’s Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford’s pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11158  Respondent: 10916417 / M.C and K.G Sandford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the huge number of houses planned for the Horsley area on the grounds that the infrastructure, particularly the roads, simply won't be able to cope with the extra traffic. Ockham Road South, one of the main arteries, is narrow and winding with no scope for improvement.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11159  Respondent: 10916417 / M.C and K.G Sandford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I also object to the sheer number of houses planned for this mostly rural area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/270  Respondent: 10916897 / Christopher Bennesch  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to OBJECT to the 2016 Draft Local Plan. I list below my following specific objections

1. All erosion to the Green Belt
2. To site A43 Garlicks Arch
3. To site A43a ramp at Clandon which will increase traffic problems.
4. A45 The Talbot overdevelopment in a conservation area
5. A57 The Paddocks, this is unlawful.
6. Lack of provision for new schools
7. Lack of provision for Doctors surgeries.
8. Limited consultation period.
9. Last minute inclusion of new sites
10. Lack of evidence for the alleged housing need numbers.
11. I totally OBJECT to the removal of any villages from the Green Belt.

Please record EACH of my TWELVE objections and acknowledge receipt of this email.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/8236  Respondent: 10917089 / Maria Schirmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Site Allocation A42 (Clockbarn Nursery, Tannery Lane - Send)

I OBJECT

For the same reasons I object to Site Allocations A43 & 44; the A247 cannot cope with any more traffic and the village of Send (and surrounding areas) does not have the infrastructure to cope. Send has one GP surgery that is already oversubscribed and one has to wait a good number of weeks for an appointment (if one is lucky). There are “two” bus services, the 462 and the 463 which alternate to run once an hour and the first bus does not get people to Woking in time (fast train connection) to get to London (where many people work) for a work start time before 09h00 – the very first bus of the day only gets to Woking at 08h05 – which means most people will rely on their cars to get to work and their children to school, especially as there is no secondary school within walking distance.

In addition traffic coming from Tannery Lane trying to merge onto Send Road already struggles due to cars parking on the kerbs / alongside the kerbs. It’s very poor visibility and it will be a major safety risk having even more cars.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Site Allocation A43 (Land at Garlick’s Arch, Sent Marsch Burnt Common and Ripley)

I OBJECT

Whilst I think we all realise that there is a need for more housing within the local borough, planning an additional 400 houses and industrial space at this site is just reckless. The A247 leading through Send barely copes with the traffic it already has. I realise the idea of Site A43a (new slip road) is designed to avoid just this but realistically it will not happen. It goes without saying that anyone looking to commute towards London will head through Send to Woking to catch a fast service to London (25 Minutes and numerous services in an hour) vs heading over to Clandon or Horsley, a journey which takes nearly twice as long and only every half hour. Many of the secondary schools closest to the area are the other side of Send, heading towards Woking. The A247 is incredibly narrow in parts and cannot be widened. Even with the current traffic there often are long tail backs along that road, especially heading towards the roundabout at Old Woking; the roads in Old Woking also are just too narrow for more traffic. Furthermore; Send just does not have the infrastructure (schools, GP, public transport, local shops etc) to cope with so many more homes / people / cars.

As for the industrial site; there is sufficient land surround surrounding Slyfield Industrial Estate; and this should be extended first, before any additional industrial estates are contemplated elsewhere. And if Slyfield cannot be extended for whatever reasons, there are other brownfield sites that should be considered before very precious green belt is. Heavy industrial traffic will result in hugely increased levels of noise and pollution; levels already high enough as it is.

Finally, it needs to be remembered that the site A43 is known to flood; for that reason alone this site should not be built upon. The large area of Ancient Woodland needs to be protected. Woodlands are vital to environmental air control and also our very precious wildlife; something which it sadly seems GBC doesn’t really worry or care about.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site Allocation A43a (Land for new north facing slip roads to/from A3 at Send Marsch, Burnt Common)

I OBJECT

Again the objection is due to the hugely increased traffic that will impact the A247 – Send Road; a road that simply cannot cope with any increased traffic volume and increased levels of noise and pollution due to larger traffic volume.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Additionally I have the following comments regarding four Site Allocations – all of which I OBJECT to for reasons given

1. Site Allocation A44 (Land West of Winds Ridge and Send Hill, Send)

I OBJECT

The area in mind is accessed by two very narrow roads – Send Hill on the one side and Potters Lane from the other. Extending the number of houses by 40 as well as the two proposed traveller pitches (meaning larger cars and most likely caravans) will put more pressure on these roads. As it is, Potters Lane, as it nears the junction with Send Hill, already has major traffic issues with people parking on kerbs and not leaving space for pedestrians (so bad that more than once a blind resident of that area who relies on their guide dog was unable to get to town because the kerb was blocked by cars, traffic was heading through the narrow gap on the road; resulting in the guide dog being unable to safely guide her further and turned them around to go home).

In addition, the proposed land used to be a landfill which was used for unsafe waste – something GBC is well aware of. From a health and safety aspect alone this site should not be developed on and most certainly not until a full and through environmental inspection of the land has been carried out by an INDEPENDENT contractor.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT

To the village of Send being removed from Green Belt. Not only because I really feel that the village should retain its rural feel – which after all is why most people chose to move there - but more importantly the green belt ensures Send acts as a very vital buffer between the boroughs of Guildford and Woking. Without this buffer the two run the risk of merging in to one huge city! Ash and Tongham are having new green belt designated just for this reason. As has been pointed out no doubt numerous times, it was an election promise to keep and protect the Green Belt; this proposal of unnecessarily huge development and the removal of the greenbelt goes against everything the people voted for! We voted for you because you said you’d protect the area!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I would like to raise the following objections to the plans proposed to impose a change of use on the Clockbarn nursery site (A42) and to develop and build 45 residential dwellings.

• The current Clockbarn site is presently agricultural land within the Greenbelt and should have such status preserved.
• Tannery Lane does not have the width to accommodate the recent increased traffic, particularly as a result of the development of the Tannery light industrial estate which generates at least 100 cars and tens of commercial vehicles passing along it each working day. An additional increase in vehicles resulting from this proposed residential development would create a traffic congestion situation that the lane simply could not accommodate.
• Present traffic turning right into Tannery Lane from Send Road (A247) often creates a queue backing up Send Road as a result of the volume of traffic passing along the A247, being a main artery between the A3 and Woking. This creates delays for what is already a busy route for many, especially in peak traffic times.
• Present traffic turning out of Tannery Lane onto the Send Road (A247) frequently backs up down Tannery Lane as the volume of traffic passing along the A247 means vehicles must wait a considerable time for an appropriate gap in the traffic to turn out of Tannery Lane.
• An increase in the volume of vehicles passing in and out of Tannery Lane would exacerbate this existing problem.
• The width of Tannery Lane heading towards Newark Lane is, in some places, only a car's width wide and has several blind corners. Additional traffic simply cannot be accommodated along this stretch of the lane. It would
be impractical to look to widen this stretch as it is primarily bordered by residential front gardens and Papercourt Marsh.

- Tannery Lane is a route to which many walkers, joggers, dog walkers, cyclists and hikers take to get to the River Wey with its towpaths and footpaths. An increase in traffic, which would result from this proposed development, would make this route hazardous for those not in vehicles.
- There is an existing approved planning application in place for some 64 houses to be built on land associated with the Tannery light industrial unit. I propose that the Council give serious consideration to this fact in determining the validity of an additional residential development at Clockbarn. Should the Clockbarn development be approved, the number of residential dwellings that could be constructed along this 1/2 mile section of Tannery Lane is excessive and unwarranted.
- I propose that the Council also take into account the recent approval of the marina development, again adjacent to the Tannery light industrial units. Whilst not approved for any residential dwellings, the facilities proposed will give rise to an increase in traffic, both of private and commercial use and should be considered in conjunction with the Clockbarn proposal.

The combined and collective consequences of all of these approved and proposed developments along Tannery Lane will have an irreversible impact on a Surrey country lane that does not have the capacity to accommodate the overenthusiastic interpretation of the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6902  Respondent: 10917505 / Peter Cheese  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object in the strongest possible terms to the Guildford Borough Council Local Plans to include the former Wisley Airfield for a major development of a new town. This proposal was unanimously rejected by GBC, and yet it is now being included in the Local Plan.

The plan would have 70% of new houses being built in the protected greenbelt and would destroy for ever the environment surrounding the small local communities of Ockham and Horsley.

I strongly object to the disproportionate allocation of new housing in this area with over 23% of the Plan for new housing being in the area of the Horsleys, Ockham, Ripley and Send, when today only 0.3% of the population living within Guildford Borough live there today.

I, like so many others who live in the area have consistently objected to these proposals on a wide range of grounds. I hope that you will take this and the many other objections being raised in to very serious consideration. A new town of this scale would inevitably absorb the local villages and set the precedent for creeping suburban growth and destruction of the greenbelt so close to London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object very strongly as I have done before to the inclusion of Three Farm Meadows in the Draft Local Plan.

There are many reasons for the objection as have been put forward before and remain fundamental objections and reasons why this should not go ahead.

The area is Green Belt land and I object to the change in the Green Belt boundary to the eastern end of the site

It is a totally unsuitable site for development because of the constraints on the site and the physical location

The site is also very close to the most congested road network (A3 and M25) and most congested M25 junction of all (juction 10)

It is also adjacent to RHS Wisley where visitor numbers will increase by 500,000 per annum. So this means more traffic.

The roads around the three Farm Meadows are also totally unsuitable for any more traffic. They are unlit narrow and without pavements. There would not be sufficient employment on his site for people to work so people would have to travel by car/ walk/ cycle along these unsuitable lanes.

The stations and schools are at their full capacity. No room for more cars in railway car parks and the site is further from stations than any other strategic site.

Any bus services will have to face the crowded SRN and this would result in unreliable services and delays.

These are just some of the many reasons why this site should not be included in the Local Plan. If this area were to be developed in ways that have been proposed and rejected through previous planning applications it would fundamentally alter the environment, landscape and community of the several small villages in the area for ever.

I along with many other residents and local people have objected many times, alongside other statutory planning applications, and the Council should remove this Three Farm Meadows Site from the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
As I’m sure you are aware, the school shortage (amongst other infrastructure issues) has and is still affecting many of the residents in this area. I have experienced this first hand and can assure you that a large influx of students without major investment in either a new school, or upsizing the existing – such as the Howard of Effingham – would be catastrophic. Had this been proposed with any degree of confidence in the ‘plan’ I would be interested to hear what the suggested solution to the narrow and badly kept roads which link residents to schools in the area would be. It is clear that this would require major work, which would likely cause chaos for an extended period of time.

Likewise, the commuter trains into London are already packed and adding another rail line or the facilities for faster trains would only encroach further onto the countryside we are trying to save.

The land is not only valuable for residents but attracts a number of tourists to the area which bring obvious benefits to local communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8119  Respondent: 10917537 / Elin Keyser  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have lived in Horsley for the majority of my life. I am now 22 and have grown-up with the beauty and serenity of what I believed to be green land which would remain so for generations to come. I am not only disappointed at the government’s dismissal of the Green Belt policy – a policy everyone was lead to believe to be permanent - but angered by the lack of alternative solutions proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8121  Respondent: 10917537 / Elin Keyser  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The ‘plan’ does nothing to assure me that a cohesive and holistic approach to providing more housing in Surrey is being thought about. It seems fragmented and slightly desperate in its desire to place people in what must appear to planners to be ‘free’ space. That it is not.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/341  **Respondent:** 10917633 / David Toothill  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Traffic and Parking. The impact on local roads will be tremendous. Parking at Horsley and Effingham stations (which is already full),

at the shops, at the medical centre and village hall will all be affected. Local Road Network. It appears that the Plan is proposing a strategic site at Wisley Airfield without knowing what improvements to the local infrastructure will be required. This is also true for the proposed developments in the Horsleys.

Pollution. Increased traffic will mean more nitrogen dioxide and particulates in the environment. Already a cause for concern in

the area.

Flooding. The site behind Ockham Road North in East Horsley is partially a level 3 flood risk area and local residents are well

aware of how much standing water there is in their gardens after rain.

Schools. Local schools are already at capacity - where will the newcomers go to school?

Medical Facilities. The same as schools.

Loss of Green Belt land. Creeping development has led to almost continuous housing from Central London to Effingham. Is this to carry on to Guildford and beyond?

Transport. Misery for commuters. Nowhere to park and full trains at commuting times.

For these reasons I am against the developments for the Horsleys which are included in the Draft Local Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/3070  **Respondent:** 10917697 / Sarah Rowe  **Agent:**

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<table>
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<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26</th>
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</tbody>
</table>

We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPA16/3853   Respondent: 10917985 / Alan Stephenson   Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
</tr>
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</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

The existing infrastructure is not sufficient to cope with the proposed developments

The Plan does not set out in clear detail how the the essential infrastructure will be developed

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/3852   Respondent: 10917985 / Alan Stephenson   Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</tbody>
</table>
Their is no plausible evidence to support the high level housing need stated in the Plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7224  Respondent: 10917985 / Alan Stephenson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am particularly concerned at the proposed development of the Gosden Hill Farm site which will have a massive adverse impact on the Burpham area of the Borough. The existing infrastructure will not support this development and a decision is required on a tunnel before any development of this site can be considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/16181  Respondent: 10917985 / Alan Stephenson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am opposed to the developments on the Green Belt which cannot be justified

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/16182  Respondent: 10917985 / Alan Stephenson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Their is a disproportionate level of development in and around the Burpham area of the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2300  Respondent: 10917985 / Alan Stephenson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In view of flawed new evidence, Guildford's proposal for 12,426 homes (plus a buffer of 1,155 homes) is excessive and will result in needless loss of Green Belt and green character, and increased congestion, that cannot be justified in our heavily constrained borough.

Population Growth

There is evidence that Guildford's population growth is overestimated by about 40% because of under-recording of students leaving at the end of their studies.

Student Accommodation

The revised proposal that only 60% of full time Guildford based University students will be provided with accommodation on campus puts unnecessary pressure on housing stock in the town. An 80% target could help by freeing up affordable homes relatively quickly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2301  Respondent: 10917985 / Alan Stephenson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Green Belt Protection

If the Council fails to apply Green Belt protection or constrain expansion to reflect widespread, legitimate environmental and transport constraints, the 2017 Plan will cause harm to the qualities that underpin the economic success of Guildford and aggravate congestion.

Land Development

Allocating too much land for development in the 2017 Plan will also result in Guildford being required to provide homes for Woking on our Green Belt which is folly given the constraints in Guildford, a gap town with constricted roads in the Surrey Hills ANOB.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4480  Respondent: 10918209 / Veronika Ferenczi  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I attended the meeting on 8th April regarding The Wisley Property Investments Ltd (WPIL) planning application of January 2015 (Ref: 15/P/00012) and this was unanimously rejected by GBC following the recommendation of the GBC Planning Officers.

The reasons for the refusal of the application were many but included that the proposed development:

(a) was an inappropriate development within the Green Belt;

(b) would have a clear and substantial detrimental impact on the openness of the Green Belt and conflict with the purposes of including land within the Green Belt;

(c) failed to demonstrate that the benefits amounted to very special circumstances such as to clearly outweigh the harm to the Green Belt and the other harm identified;

(d) failed to comply with the objectives of policy RE2 of the Guildford Borough Local Plan 2003 (as saved by CLG Direction dated 24/09/2007) and chapter 9 of the National Planning Policy Framework;

(e) was within the 0 -400m and the 400m to 5km zones of the Thames Basin Heaths Special Protection Area, etc.

(f) would have a severe adverse impact on the safe and efficient operation of the strategic road network, and a severe impact on the efficient operation of the local road network;

(g) failed to deliver the required transport sustainability measures;

(h) failed to secure an appropriate provision of affordable housing;

(i) was detrimental to the viability and vitality of the existing district and local centres in the vicinity of the site;
(j) would result in loss of the safeguarded waste site;
(k) presented a dense and urban form of development owing to its quantum and scale;
(l) had an adverse impact on the setting and significance of a designated heritage asset;
(m) had an unacceptable air quality impact;
(n) impacted on education infrastructure;
(o) impacted on policing infrastructure;
(p) impacted on health infrastructure;

So I was completely baffled when we went to the next meeting at the GBC Millmead, on 24th May, to be told that they were going to go ahead with the plan anyway!! So why are we continually writing our objections when they are completely ignored?

Anyway, I object very strongly to the submission of the local plan, specifically for The Three Farm Meadows (the former Wisley Airfield). I could rewrite my objections from all my previous emails/letters, but I cannot see that they will make a difference!!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1302  Respondent: 10918209 / Veronika Ferenczi  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to object to GBC’s Proposed Submission Local Plan unreservedly. As a local resident I have objected to all the proposals the GBC has put forward along with thousands of others in our area. It really is appalling that our objections have been completely ignored and the Local Plan has failed in the number of key areas to take into account or to answer our valid comments and criticisms submitted by thousands of residents and organisations in respect of the previous 2013 Draft Local Plan. What is the point of us all objecting whole-heartedly if we are just ignored. I have to say that in my opinion it raises questions about your governance and vested interests.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3006  Respondent: 10918273 / Katharine Moss  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1/ I OBJECT to Send Village being removed from the green belt. This was intended to be permanent as required by the National Planning Policy Framework. There is No special reasons why this should be abandoned. Green belt is an essential buffer stopping Woking and Guilford becoming one location. Local government gave a very clear election promise to protect the green belt and this contravenes that completely. This land cannot be developed on and lost forever.

2/ I OBJECT to building 45 houses at Clockbarn Nursery. Access is inadequate and traffic issues will arise in surrounding roads including Tannery Lane which is far too narrow and twisty to take any more traffic. The junction with Send Road is already very dangerous for vehicles trying to join the main road and permission has previously been given for apartments at the tannery and for building at the marina both of which will generate further heavy traffic. These roads can not take any more and the junctions is already dangerous so please do not allow this site to be developed.

3/ I OBJECT to building 400 houses and 7000 m² of industrial space at garlics arch. The site floods significantly and is covered by ancient woodland and industrial space is not required in the vicinity where there is plenty nearby at Slyfield. Guildford's housing requirements have been shown to be exaggerated significantly and they have refused to disclose their calculations. 400 houses will have major impact to Send and Ripley and the infrastructure cannot simply cope with a development of this size. We are already ping-ponged out to any secondary school in the county, need to plan to be ill to get an appointment at the Drs etc etc! It's too big and must be removed from the local plan. This was also sneaked in at the last minute from a proposal all of 100 houses which is still too many on such valued ancient land.

4/ I OBJECT to the development of 40 houses and two travellers pitches at this site in Send Hill. It is a completely inappropriate location because the narrow single width access to the country road provides insufficient access and would be very dangerous. This is an extremely busy road especially in the early morning with many parents taking their children through this route to send school. This immediate area also sees extra traffic when the A3 is heavy with northbound traffic or in ever increasing cases of road closure due to accidents! It is a beautiful site which was previously a landfill site and for this reason alone it should not be built on. This site has been refused before for the above reasons and I urge you to remove this from the local plan.

5/ I OBJECT to a new interchange with the A3 at burnt common because Send would have to take the traffic from proposed developments at Wisley Airfield, Gosden Hill, Burpham and Blackwell Farm. This totals over 4800 houses. Traffic from these developments would use this new interchange creating gridlock in the villages. It can already take 15-20 minutes to drive from Send School to the A3 northbound!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object that the allocation has risen from 45 to 60 homes.
this is an unacceptable 33% increase
100s of previous objections have been unacceptably ignored
Access and traffic problems will unacceptably worsen at Tannery Lane and the A247 Junction
It will unacceptably erode the Green Belt in our village
Surface water is already bad and unacceptably worsen.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/4132  **Respondent:** 10918273 / Katharine Moss  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to 400 homes and 6 Travelling Show People plots.
Unacceptably this ignores 1000s of previous objections
Demand for Travelling Show People Pitches is an unproven requirement
This is permanent Green Belt land and there are NO 'exceptional circumstances'.
This will result in overdevelopment with excessive homes.
This is an ancient woodland dating to the time of Elizabeth I
Ripley and Send will become one and defeat the key purpose of Green Belt
It is Zone 2 flood allocations area and subject to frequent flooding
it is contaminated by lead shot
it will congest further the already busy roads in Send & Ripley
There is no infrastructure to support the residents ie medical services and all three (infant, junior and secondary) phases of education

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
### Comment ID: pslp172/4133  Respondent: 10918273 / Katharine Moss  Agent: 

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

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I object to a minimum of 7,000 of industrial or warehousing.

This was removed from the 2014 draft because of previous objections.

It previously stated 'Maximum' now says 'Minimum' and there has been an reduction in demand for industrial land.

This is Green belt Land and both Slyfield and Guildford have empty units, therefore there is no requirement.

The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the in the Green Belt.

The impact on small surrounding roads will increase the gridlock we experience.

Existing Villages will be joined up.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: pslp171/2295  Respondent: 10918273 / Katharine Moss  Agent: 

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

<table>
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</table>

I object to Send Business Park being taken out of the Green Belt.

It is an old non-conforming user in an area of outstanding natural and beautiful countryside next to the River Wey Navigation.

Vehicular access is highly restricted along Tannery Lane in both directions.

Expansion or development at this location detracts from the openness of the Green Belt which is unacceptable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Comment ID: PSLPP16/6728  Respondent: 10918305 / Susan Butler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Pollution: I strongly object to the new draft plan proposing additional 2000 homes at Wisley, 2000 at Gosden Hill Farm, nearly 600 in The Horsleys and 400 at Garlicks Arch as it will have a great impact on the local road network which at peak times is already struggling. The large increase in volume of traffic will cause an increase in nitrogen dioxide and particulates in the environment - already a cause for concern in several areas in the borough. Additional noise and air pollution will be inevitable with this increase in traffic and it will have a significant impact on our environment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 

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Comment ID: PSLPP16/6726  Respondent: 10918305 / Susan Butler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Loss of Green Belt Land: I strongly object to the expansion of the Horsley village boundaries and its subsequent removal including Ripley, Send and Clandon from the Green Belt. The new mayor of London has instructed London planners NOT to approve development on Green Belt Land within the M25. If we continue to build on our countryside it won’t be too long before we have none left. There is insufficient details and/or evidence within the local plan to support why this action is necessary and therefore I strongly object. Our British countryside needs to be preserved along with our wonderful animal, bird and plant life which will be inevitably affected by the erosion of the Green Belt Land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 

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Comment ID: PSLPP16/6729  Respondent: 10918305 / Susan Butler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Flooding: I strongly object to the new draft plan in respect of flooding. The site behind Ockham Road North in East Horsley is partially a level 3 flood risk area and as local residents we are well aware of how much standing water there is in our gardens after rainfall. In fact, my husband’s car was “written off” due to water damage at the A3 roundabout at Ripley in 2013 due to flooding. Building on such land will only exacerbate the problem. Our drains can’t cope now causing chaos on our local roads during heavy rainfall.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6727  Respondent: 10918305 / Susan Butler  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Disproportioned number of new houses for local facilities: I strongly object to the number of new houses proposed within the Horsleys and surrounding villages namely Ripley, Send and Clandon. Within the Horsleys, the schools, doctors and train stations are struggling to cope with the current demand. My family commute to London from Horsley and the trains and car parking are almost at maximum capacity. Assuming that every new house has at least two cars, this means potentially 6000 more cars within a three mile radius of the villages. The impact on the local roads will be tremendous. Parking at Horsley & Effingham junction stations (which are already full), at the shops, at the medical centre and at the village hall will be affected

The proposed development plan is disproportionate to the size of the villages and is an over kill. It is directly out of proportion to the size and availability of brown field sites already available for development.

I sincerely hope you, the council, will consider my objections and avoid destroying the Borough’s Green Belt which is precious and I fear for its demise. Our British countryside needs to be protected for future generations of population, animal, bird and plant life. Please protect our environment from increased pollution and flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2581  Respondent: 10918369 / Kendall Collinson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I think that the Ockham plan to develop the old Wisley Airfield makes sense in terms of being a substantial development on what could be classed a brownfield site. It is a wide expanse of tarmac and concrete adjoining the A3. This could helpfully be developed into a village and have amenities for social housing, a traveller site and could be developed in a stand alone way which would not affect the neighbourhood as a road would be made which could link to the A3. I understand that this is not your favourite as it will incur more expense as a road will need to be made. However, it is here that all sections of the community can have their housing needs met for the minimum of trouble to the neighbours and to the landscape.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7479  Respondent: 10918369 / Kendall Collinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is no allowance for the infrastructure - the school is overloaded as is the GP surgery, car parks etc… there are not enough green spaces for playgrounds in West Horsley and the roads cannot take any more traffic. in addition, the roads are liable to flooding as are the fields. I don’t think it is necessary to build on a field or green space especially when there are brownfield sites available.

I am concerned that because the landowners want to sell and the developers want to build, the Council will go ahead without considering the local people. They are keen to tick boxes for housing needed in our area. The Green Belt exists to
prevent this so that green spaces can be respected and preserved for reason of health - less car pollution and also mental health with more space to help people to feel well and have a chance to go into open spaces. The council need to think about playgrounds and footpaths and bridleways. The landowners have been very bad at allowing people to access footpaths. The green belt belongs to the community and should be preserved not eroded. This plan would mean that the green belt boundary would be moved and so would lead to much more development with houses popping up everywhere. Everyone will want to make a quick buck.

East Horsley. Similar to West Horsley - there is not the infrastructure to support further development and the roads are impassible as it is. Near the Hotel-Ramada development is a possibility if done sensibly and to support local people rather than large 5 bedroomed houses that our children won’t be able to afford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5772  Respondent: 10918369 / Kendall Collinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. In West Horsley some brownfield sites could be developed such as the Bell and Colvill site. This is ugly and doesn’t serve the local community. The council need to take into account not just the number of houses being built but it’s impact on the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5774  Respondent: 10918369 / Kendall Collinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Moving The Raleigh school-in theory this is a good idea - I live in Northcote Crescent. But not at the expense of the Green Belt. Most of the children who go to the Raleigh don’t live in the village. I hope that you take into account that the villagers have to live with a decision on this when you look at the responses as the Raleigh school have encouraged all parents to respond and they are not all residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I think that you need to think very carefully about the aim of what you are trying to achieve if you remove the green belt. There isn’t the infrastructure and people’s lives will be negatively affected if you go ahead. Brownfield sites are one thing but building on open fields will achieve long term problems for which there are no solutions offered by the council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

In West Horsley some brownfield sites could be developed such as the Bell and Colvill site. This is ugly and doesn’t serve the local community. The council need to take into account not just the number of houses being built but it’s impact on the village.

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I think that you need to think very carefully about the aim of what you are trying to achieve if you remove the green belt. There isn’t the infrastructure and people’s lives will be negatively affected if you go ahead. Brownfield sites are one thing but building on open fields will achieve long term problems for which there are no solutions offered by the council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPS16/1813  Respondent: 10918497 / Darren Moss  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2/ I OBJECT to building 45 houses at clockbarn nursery. This is due to the inadequate access and traffic issues that will arise surrounding roads including Tannery Lane which is far too narrow and twisty to take any more traffic. The junction with Send Road is already very dangerous for vehicles trying to join the main road and permission has previously been given for apartments at the tannery and for building at the marina both of which will generate further heavy traffic. These roads can not take any more and the junctions is already dangerous so please do not allow this site to be developed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1814  Respondent: 10918497 / Darren Moss  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3/ I OBJECT to building 400 houses and 7000 m² of industrial space at garlics arch. The site floods significantly and is covered by ancient woodland and industrial space is not required in the vicinity where there is plenty nearby at Slyfield. Guildford's housing requirements have been shown to be exaggerated significantly and they have refused to disclose their calculations. 400 houses will have major impact to Send and Ripley and the infrastructure cannot simply cope with a development of this size. It's too big and must be removed from the local plan. This was also sneaked in at the last minute from a proposal all of 100 houses which is still too many on such valued ancient land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5/ I OBJECT to a new interchange with the A3 at burnt common because Send would have to take the traffic from proposed developments at Wisley Airfield, Gosden Hill, Burpham and Blackwell Farm. This totals over 4800 houses. Traffic from these developments would use this new interchange creating gridlock in the villages.

Could you please confirm receipt of my objections and I look forward to a positive conclusion to safeguard the villages from these over the top proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1815  Respondent: 10918497 / Darren Moss  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4/ I OBJECT to the development of 40 houses and two travellers pitches at this site in Send Hill. It is a completely inappropriate location because the narrow single width access to the country road provides insufficient access and would be very dangerous. This is an extremely busy road especially in the early morning with many parents taking their children through this route to send school. It is a beautiful site which was previously a landfill site and for this reason alone it should not be built on. This site has been refused before for the above reasons and I urge you to remove this from the local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3908  Respondent: 10918497 / Darren Moss  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I strongly object to the following:

1/ I OBJECT to Send Village being removed from the green belt. This was intended to be permanent as required by the National Planning Policy Framework. I cannot see any special reasons why this should be abandoned so recklessly. Green belt is an essential buffer stopping Woking and Guildford becoming one conurbation. Local government gave a very clear election promise to protect the green belt and this goes against this completely. This land will be developed on and lost forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPA16/1979  Respondent: 10918657 / Angus MacDonald  Agent: |
|-----------------------------|-----------------------------------------------|
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPS16/3903  Respondent: 10918657 / Angus MacDonald  Agent: |
|-----------------------------|-----------------------------------------------|
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPI) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.
I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8293  Respondent: 10918657 / Angus MacDonald  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8290  Respondent: 10918657 / Angus MacDonald  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8294  Respondent: 10918657 / Angus MacDonald  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8292  Respondent: 10918657 / Angus MacDonald  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLP16/3995  Respondent: 10918977 / Gillian Lachelin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object to the housing number of 693 per year. At various meetings (including a GBC meeting) I have been to no one has been able to explain how this number was arrived at.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7438  Respondent: 10918977 / Gillian Lachelin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Re Guildford Borough Council Proposed Local Plan (June 2016)

As a long term resident of Ockham I am writing to object strongly to the continued inclusion of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM), as a strategic site in the proposed new local plan.

The latest planning application for FWA/TFM was unanimously rejected by Guildford Borough Council, on April 8th 2016, for very good reasons and this site should be removed from the local plan.

In particular I object strongly to the proposal to remove FWA/TFM from the Green Belt, which has a very important and well known role. No exceptional circumstances have been demonstrated. I object to the fact that not enough attention has been paid to the environmental and ecological value of the site.

Please take seriously the very large number of valid objections you will receive and remove FWA/TFM from the draft local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>PSLPP16/16549  Respondent: 10918977 / Gillian Lachelin  Agent:</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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</table>

I object to the threats which the proposal poses to Ockham and surrounding villages. There is no way that the small local roads could cope with the huge increase in traffic which would be caused by the development. There are already severe problems on the A3 and M25 every day with frequent accidents and the pollution levels are extremely high. The trains are already overcrowded and it can be impossible to park at Horsley station during the day.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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</table>
I am writing to object very strongly to the Proposed Local Plan and I support the objections to the changes in the Plan that have been summarised on behalf of the residents by Ockham Parish Council.

I object very strongly to the inclusion of the proposed development on Three Farms Meadow (A 35) in the Local Plan, for several reasons:

I object because of the appalling traffic congestion that would result on the A3 and on local roads from the development. The queues on the A3 around Guildford are already miles long twice a day on most days and the junction (10) with the M25 is already one of the most congested junctions in the county. There have been many serious accidents on these roads in the last two years.

I object to building on the invaluable green belt. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

I object because of the increased pollution that would occur. The pollution levels on the A3 and near to the A3 are already far too high.

I object because this site is still included in the Local plan despite thousands of objections from local residents and statutory bodies, including Guildford Borough Council.

I object because the local station car parks are already full on weekdays. There is no way that dozens more people could park at Horsley or Effingham Junction stations.

I wish these objections to be fully taken into consideration and I strongly request that the proposed development on Three Farms Meadow should be removed from the Proposed Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2053  Respondent: 10919073 / John A. Easton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (south)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My wife and I would like to express our strong objections to the latest version of the Local Plan proposing the moving of the green belt boundary behind Shalford Village Hall to extend the village settlement boundary, purely to allow potential for future housing development.

We moved to Poplar Road in Shalford on retirement after 40 years in London, due largely to the unspoilt character of the local Surrey Hills villages in the Green Belt with AGLV status, and yet close to the excellent facilities of Guildford and Godalming.

Any new housing developments in this area would undoubtedly result in putting strain on the existing local roads and infrastructure and specifically, being in an elevated position behind the village hall, tennis courts and bowling green, themselves being very valuable village resources and so overlooking the village green, from which they would be clearly visible, will destroy the present rural backdrop, coupled with totally unacceptable and increased congestion in Chinthurst...
Lane which is already under considerable pressure with increased safety risks to residents from rat-run traffic, irrespective of any future parking restrictions.

Any proposed development would only provide benefits to the present landowner, builders and new occupants, with detriment to the village appearance and certainly no benefit to existing Shalford residents and as such, we would reiterate our objections to the granting of any approvals to this proposal.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPA16/219</th>
<th>Respondent: 10919105 / Susan Thompson</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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<td>I object to. The lack of immediate provision for new schools in the area (at all levels)</td>
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<td>I object to. The lack of any immediate provision for Doctors Surgeries / Hospital facilities in the area.</td>
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<td>I object to. The increase in the volume of traffic the immediate and surrounding area.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>I object to. Site A43 Garlicks Arch.</td>
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<td>I object to. Site 43a the on/off ramp at Clandon as this will increase traffic problem in the villages</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to. Site A57 The Paddocks which I am given to understand is unlawful</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>This proposed level of planning does not seem to take into account</td>
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<td>1) The increased risk of flooding to nearby homes and roads when fields are being built on. (Garlicks Arch at Burnt Common)</td>
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<tr>
<td>2) The lack of public transport.</td>
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<tr>
<td>3) The increased volume of traffic on roads which cannot cope with now.</td>
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</tbody>
</table>
4) The fact that children are already unable to get into schools of choice

5) The Health services are already under pressure in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/684  Respondent: 10919105 / Susan Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 2016 Draft Local Plan as follows :-

I object to. All erosion of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/685  Respondent: 10919105 / Susan Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to. Any "in-setting" i.e. removal of any local villages from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/686  Respondent: 10919105 / Susan Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to. The proposed disproportionate amount of development in one area of the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3887  Respondent: 10919617 / Michael Siobhan  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The development of a care home and the building of 140 homes on the fields off Keens Lane should be stopped because:

1. Once you have built on the land the fields will be lost forever, the area is Green Belt and therefore it must be protected.
2. A family of deer live and migrate across the field twice a day. You will therefore be destroying their habitat.
3. Keens Lane is narrow and dangerous to drive down at the moment without the added traffic that 140 houses will create.
4. This area is near Whitmoor Common, a site of Specific Scientific Interest.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1913  Respondent: 10919841 / J.A. Millard  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I wish to raise my objections to a series of ridiculous proposals in the recently proposed Guildford Local Development Plan.

I STRONGLY OBJECT to the removal of Send Village from the designated Green Belt. The Green Belt was meant to be a long term planning process that ensured stability of the environment for the benefit of local people and avoid urban sprawl. Instead the proposed plan compromises these laudable objectives for short term gains at the expense of the local communities. The continual breaking-up and moving around of designated Green Belt areas is a travesty of the original intent and severely undermines the countryside that remains in Surrey. If the proposed plan is carried out Send will become part of growing urban sprawl and the whole character of the area will be ruined. This is not what local people want and need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:  PSLPS16/3805   Respondent:  10919841 / J.A. Millard   Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I STRONGLY OBJECT to the planned development of 2,000 homes at Gosden Hill Farm, Merrow. This is another enormous development that will destroy another significant area of an already badly eroded Surrey. This is not answering the needs of the local community and will totally overwhelm the local infrastructure. When will this greed and stupidity end?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:  PSLPS16/3802   Respondent:  10919841 / J.A. Millard   Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I STRONGLY OBJECT to the proposed building of 45 houses at Clockbarn Nursery. Tannery Lane has insufficient capacity to accommodate this development. This exceedingly pleasant area will be totally ruined by this proposed development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPS16/3801  Respondent: 10919841 / J.A. Millard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I STRONGLY OBJECT to the proposed building of 400 houses and 7000m² industrial space at Garlick’s Arch. This is an unbelievably large development for the area. The road systems are already up to and beyond capacity and the extra road traffic from both cars and lorries will be unbelievably bad for congestion and the environment. Undoubtedly this will ruin the aspect of the focal area with regard to both Send Marsh and Burnt Common. This is a development totally disproportionate to local needs and will overwhelm local infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3804  Respondent: 10919841 / J.A. Millard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I STRONGLY OBJECT to a new interchange for the A3 at Burnt Common. This will be the final death knell for the Send/Ripley area with a huge increase in traffic transiting through an inadequate road system. This is not for the benefit of local residents but rather for self-serving developers. It will massively increase noise and pollution levels and will no doubt further extend the effect of the tarmac desert that is the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3803  Respondent: 10919841 / J.A. Millard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I STRONGLY OBJECT to a new development of 40 houses and 2 travelers' pitches at Send Hill. Again this is an excessive development for the location and will ruin another area of pleasant countryside. This insidious erosion of the countryside around Send is not what local residents want.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/8093</th>
<th>Respondent: 10919841 / J.A. Millard</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

General. Ultimately, all the above extravagant developments are for the benefit of outsiders and not the local community. Guildford Borough Council is reacting to the demands of forces outside the communities it is meant to be serving. In doing so it is even going against the stated commitment of central government to protect the Green Belt. The consequent massive negative impact on local residents is being ignored. Guildford Borough Council should concentrate on satisfying the genuine needs of the borough's population through much smaller scale and more spread out developments in sympathy with the local environment. It should be serving those who ultimately elect them to office. Developments should not be disproportionately impacting on one area of the borough. Surrey already bears the scars of much thoughtless and unnecessary development. Continued proceedings along these lines will result in the local population ensuring that only those councillors and parties who are sympathetic to local needs are elected in future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/2793</th>
<th>Respondent: 10919841 / J.A. Millard</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to Policy A42 Clockbarn Nursery, Tannery Lane. The 33% increase in number of homes proposal is far too much for these small lanes which are already jam packed at rush hour. The increase in numbers from 46 to 60 homes is a blatant ignoring of the deep objections by all the local community. It is a serious erosion of Green Belt in an area of scenic natural beauty and will make the area less attractive to the River Way Navigation canal users, walkers and tourists. Drainage in an area that is already waterlogged in winter will be further exacerbated causing more problems to the neighbourhood.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2794  Respondent: 10919841 / J.A. Millard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A43, Garlick’s Arch, Send Marsh. This is Green Belt land and should not be touched for development at all. It provides a green lung between the pollution and noise of the A3 and the communities of Sendmarsh and Burnt Common. Building on this lane will exacerbate health issues in the local community in particular hose relating to respiratory problems and stress. This policy ignores the thousands of strong objections. By the local communities. This area includes ancient woodland this is rare in South East England. The development will lead to urban sprawl with the joining up of Ripley and Send. The building of 400 homes in this area will overwhelm the local road system which is already at its limit during peak times (e.g. turning right from Send Marsh Lane onto the Old Portsmouth Road can take 20-30 minutes at rush hour in the mornings before these additional homes are included). The land is not suited to development due to its Flood Zone 2 allocation and need to be decontaminated of load accumulated over fifty years. Also, the Council has not proven the need for Travelling Showpeople plots. The bottom line is that the Guildford Borough Council has not provided evidence for exceptional circumstances to justify development of this Green Belt Land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2795  Respondent: 10919841 / J.A. Millard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to Policy A53, Burnt Common, London Road. This was deleted from the Local Plan 2014 draft because of all the local communities’ objections and should not be resuscitated. Guildford Borough Council have not provided exceptional circumstances for building on this Green Belt Land and there are better alternatives at Slyfield Industrial Estate and other locations in Guildford where relevant infrastructure already exists. This policy change contradicts the 2017 Employment Land Need Assessment which shows a reduction in demand for industrial lane for the whole borough. The implementation of 7,000 square metres of industrial and/or warehousing will bring gridlock to the local roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1286  
Respondent: 10919841 / J.A. Millard  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy 2 at paragraph 4.3.15. Guildford Borough Council has not provided evidence for the removal of Send Business Park from the Green belt. Potential development of this area will potentially overwhelm Tannery Lane and the associated country lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2380  
Respondent: 10919937 / Eileen Miriam Harris  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35- for the phased development of a new settlement of up to 2100 dwellings.

I object to the draft Local Plan for the following key reasons:
I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

I object to the detrimental impact on transport, local roads and road safety. I specifically object to: The assertion that the development will result in a meaningful shift to cycling and walking.

The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars

The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads

The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements

The Village of Cobham attracts many visitors with its shops and restaurants and the most direct route from the area of Ockham is via Ockham Lane. This road was built for easy access to Cobham for use by the local residents, it is very narrow with no footpaths or cycling track and is only suitable for light traffic due to having very many bends and blind corners. It passes through Ratchford and a flood plain, it is very often closed due to flooding. The danger that any increase in traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them) has to be considered.

The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement words on due to start until 2019 at the earliest

The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPJL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.
I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2428  Respondent: 10920001 / Jeff Doyle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4786  Respondent: 10920001 / Jeff Doyle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 Gosden Hill as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt, which will see coalescence and urban sprawl from Burpham to West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4787  Respondent: 10920001 / Jeff Doyle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**I OBJECT to the inclusion of strategic site Policy(A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local community. This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I OBJECT to Policy A43a, the proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4790  Respondent: 10920001 / Jeff Doyle  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4791  Respondent: 10920001 / Jeff Doyle  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10102  Respondent: 10920001 / Jeff Doyle  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/10101  Respondent: 10920001 / Jeff Doyle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12866  Respondent: 10920065 / Roz Tacon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Thirdly, we are particularly concerned that the infrastructure proposals are inadequate even to meet the needs of what is there at the moment, let alone the proposed developments in the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12865  Respondent: 10920065 / Roz Tacon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We note that the Proposed Submission Local Plan includes the statement “We will continue to protect the Metropolitan Green Belt”. We fully and unequivocally support this policy. However, unfortunately GBC appears to be in breach of this same policy through the housing policies it has set out in the Proposed Submission Local Plan, whereby some 65% of developments will be made on land that is currently Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12864  Respondent: 10920065 / Roz Tacon  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Further to the EHPC letter of objection (of June), we agree and endorse the reasons for objection raised in their response. It is our view also that:

We have strong concerns about the Proposed Submission Local Plan and the evidence and assumptions which support it. In particular, we do not agree with the scale of the house building programme which is being proposed by GBC. The target outlined represents a 25% increase in the housing stock of the borough, whilst we note that the Office of National Statistics (“ONS”) projects a population increase of some 15% for Guildford Borough over this same period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6829  Respondent: 10920129 / Steven Marshall  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

OBJECT. The strength of public opinion on this matter has already been felt but it appears to have been ignored by the Council. Building a new town of 2000 homes in the middle of the Green Belt would have terrible consequences for the environment and for current residents. The impact on roads (during the building and when the town is up and running) would be atrocious. Commuters would have to travel to work via car and/or train. Horsley and Effingham stations would see extra commuters. Local shops in Horsley are likely to attract yet more customers, which is great in theory but as the only way here is by car, where will they park? Where will the children of the new town be educated? Which surgery will they use? It cannot be sustainable development if the infrastructure cannot cope. It is unsustainable.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPS16/6826</th>
<th>Respondent: 10920129 / Steven Marshall</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY A36: Hotel Guildford Road.** OBJECT. The current infrastructure cannot take a further 48 new homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT. I object to the scale of the building work being proposed for East Horsley – a increase of 36% - and to the fact that the four proposed sites are currently all within the Green Belt. I object because of the strain it would place on current infrastructure and because it would destroy the character of the village. The Council seems committed to pushing back settlement boundaries to provide more greenfield sites for new housing. In short, to destroying the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A39</td>
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</tr>
<tr>
<td><strong>Land behind Ockham Road North, near Horsley railway station</strong></td>
<td>OBJECT. I object to building on a green-field Green Belt sit. Moving the boundaries to achieve this is unjustified. The infrastructure cannot sustain these houses.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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| **Comment ID:** PSLPP16/14777  **Respondent:** 10920129 / Steven Marshall  **Agent:** |
| **Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D4 |
| **Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )** |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

<table>
<thead>
<tr>
<th><strong>Development in urban areas and inset villages</strong></th>
<th>OBJECT. As mentioned before, I object to the insetting of East Horsley from the Green Belt. Development in inset villages is unsustainable as it does disproportionate harm to the environment, increases road traffic, worsens air quality and puts unreasonable demands on already overstretched services, such as schools and medical centres. The infrastructure of East Horsley is just not able to support the additional housing being proposed.</th>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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| **Comment ID:** PSLPP16/14771  **Respondent:** 10920129 / Steven Marshall  **Agent:** |
| **Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1 |
| **Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )** |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

<table>
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<tr>
<th><strong>Meeting employment needs</strong></th>
<th>OBJECT. Building industrial and commercial enterprises in a rural environment is the worst of both worlds – it destroys the character of the rural environment and will again have an adverse effect on the environment as employees will have to travel to work.</th>
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<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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The leisure and visitor experience OBJECT. The leisure and visitor experience is likely to be seriously damaged by the new building plans. Destroying parts of the Green Belt will have a negative impact on the natural beauty of the area, something that currently attracts cyclers, walkers and visitors to historic properties.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/14775</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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Guildford Town Centre OBJECT. The town centre is the logical place to locate new housing – work and leisure opportunities abound. That would make more sense than building yet more shops.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Local centres OBJECT. Building retail sites adjacent to the 6 rural centres and on the edge of designated centres is wrong as it leads to creeping urbanisation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14765  Respondent: 10920129 / Steven Marshall  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Homes for all OBJECT. Again I challenge the scale of new building being proposed and raise the concern that the infrastructure cannot support it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14766  Respondent: 10920129 / Steven Marshall  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Affordable homes OBJECT. While I accept the need for some new starter homes, surely the logical location for these would be in places with employment opportunities such as town centres. Otherwise, the new residents would need to commute to work with all the downsides in terms of the impact on the environment, more pollution, more road congestion, greater strain on rush hour train services etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/14767  Respondent: 10920129 / Steven Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Rural Exception Homes OBJECT. I object to this policy as it allows homes to be built anywhere near a settlement and ignores all historic planning restrictions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14778  Respondent: 10920129 / Steven Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Transport OBJECT. As I have already stated, the infrastructure of East Horsley is the main reason for objecting to the Council's proposals. The roads are already congested, are generally narrow, with potholes. During heavy rains, the drains block and flooding results. The local primary school, the Raleigh, is at capacity as is the local secondary school, the Howard of Effingham. I understand that Horsley Medical Centre is also at capacity. Forcing a further 593 new homes (from the 11 development sites identified for East and West Horsley) into the village will have terrible results for everyone who lives here. Add in the proposed development of a new town at Wisley airfield and it is apparent that the infrastructure cannot cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14768  Respondent: 10920129 / Steven Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Surrey Hills Area of Outstanding Natural Beauty OBJECT. The vague, undefined "exceptional circumstances" clause will allow the Council to develop in the Surrey Hills Area in the future. This indeed weakens the protection currently afforded to the Surrey Hills.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Green Belt OBJECT. I object to the proposal to inset East Horsley within the Green Belt. East Horsley is exactly the type of rural village the Green Belt was designed to protect – rural village with narrow winding lanes, lots of green open space etc. The Council’s plans will lead to the village becoming a suburb of Guildford, destroying East Horsley’s character. I also object to the proposed boundary changes for the village and the removal of Wisley Airfield from the Green Belt on the pretext of meeting the Council's "unfulfilled housing need" - this is not an "exceptional circumstance".

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

– Countryside (i.e. countryside beyond the Green Belt) OBJECT. Why should more homes be built in the countryside when there are adequate brownfield areas within the urban area already identified? These should be developed first to meet the housing need

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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**OBJECT.** While I support the idea of sustainable development, the rural areas identified for development lacks the infrastructure to support new housing on the scale planned. As such, it is not sustainable development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<tr>
<th>Comment ID: PSLPS16/5036</th>
<th>Respondent: 10920609 / Peter Filmer</th>
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**Borough Wide Strategy**

**OBJECT.** I object to the large scale of the proposed building programme - a net increase of 25% in the housing market of the Borough. That is greater than any population growth forecasts.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Dear sirs

I wish to record my objections to these proposals on the following grounds:

- So far no exceptional circumstances have been established to warrant removing the site from the Metropolitan Green Belt
- There is ample brownfield land in urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.
• I seriously object to the removal of the Former Wisley Airfield from the Green Belt. The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford.

• I also object to the disproportionate allocation of a proposed increase in housing to the nearby localities of Ockham, Ripley, the Horsleys and Effingham.

• The Local Plan as drafted poses a threat to the historic rural settlements of Ockham, Hatchford and Downside.

• The plan calls for Ockham, a hamlet of 159 residences to be subsumed into development, on presently open land, with 2,000 dwellings and other urban-style buildings up to five storeys high and a population density higher than most London boroughs.

• I object to the potential harmful impact on transport, local roads and road safety by the suggested development. The result of an additional 2,000 homes would be an estimated 4,000 additional cars together with other vehicles, including HGVs, to service the development. There would be an increase in the already severe congestion on the Strategic Road Network of the A3 and M25 and the junction of those as well as local roads. The current planning application by RHS Wisley would already have significantly added to visitor traffic. Any proposed secondary schooling would add additional congestion.

• There is a serious lack of suitable public transport. The local rail stations of Effingham and Horsley could not cope with the proposed increase in passenger traffic and car parking is already at capacity. In the refused planning application there had been a suggestion that Cobham & Stoke D’Abernon Station could be used. That or use of stations further north at Weybridge or Walton would increase congestion and pollution on local roads in Elmbridge and I know as a resident of that area that the roads simply cannot accommodate more traffic without serious consequences.

• I am very worried that the issue of air quality is not being taken seriously. Air pollution in this area in the north of the Borough of Guildford and the south of the Borough of Elmbridge and particularly near the M25/A3 junction already exceeds EU-permitted levels. Additional traffic would worsen the situation, affecting the health of all current and future residents.

• I object to insufficient consideration being given to the environmental and ecological value of the site and the area around it, taking account of the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

Objections are supported by the unanimous rejection of application no 15/P/00012 by the Planning Committee at Guildford Borough Council on 8th April 2016 on the recommendation of Planning Officers. The Planning Report identified the serious concerns now being highlighted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/2995  **Respondent:** 10920801 / Andrew Roach  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**
The local plan also proposes the development of Clockbarn Nursery and Garlick’s Arch. The additional traffic congestion and demand for additional school places will pose significant demand on already stretched local services and further undermine the quality of life that the current residents enjoy. I particularly object to the proposal for 40 houses and traveller’s pitches at Send Hill. The road access and local services are not sufficient and would be a blight on the local area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I object strongly to Send Village being removed from the Green Belt. The current Green Belt provides a very clear buffer stopping Woking and Guildford merging into one large conurbation. I see no justifiable reason for election promises being broken.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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The level of vandalism proposed by the local plan is unacceptable and must be stopped and elected representatives need to serve those who elected them.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPA16/3829</th>
<th>Respondent: 10920865 / Sebastian Forbes</th>
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<td>Has sufficient consideration been given to infrastructure? I recall someone from council telling our road AGM a few years ago that 'planning comes first, and the infrastructure will follow'. What rubbish! Building 400 houses implies 700 cars, and the consequences of that need to be fully accounted for.</td>
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<td>Is there an accurate figure of how many new houses are actually required (not skewed by political bias)?</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>However, I'd be happy for some houses on Garlick's Arch and more industrial building at Slyfield. There are other spaces which are OK for housing. But all this depends on the provision of adequate roads, shops, etc etc.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Also, I'm warmly in favour of sorting out the interchange at Burnt Common and A247 - long overdue. The middle of Ripley would be much clearer - good. But have you considered the knock-on effect on the road from Send? There's no indication that you have.</td>
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<td>There are, as you must know, a number of places that simply cannot take existing traffic safely, let alone more traffic after more house-building.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Why so many more houses here in Surrey, which is England's most densely populated county?</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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I have a number of points to make about the proposed extra housing around the area of Send and Ripley. It would be nice to receive answers to specific questions rather than an automated answer that goes to every writer. I refer specifically to Garlick's Arch (Policy A43) and Burnt Common (Policy A58).

Does this area actually require more housing? I have heard that this is not so.

If it really is so, I'm not against either of these areas having more houses, on condition that my points (c) and (d) are acted upon, with information about your ideas and plans; nothing has so far appeared.

It must surely be obvious to anybody, as I've said before more than once, that if you build 400 more houses, that means 700 more cars. And yet, at an AGM of our road's Association some years ago (Boughton Hall Avenue is a private road) someone from GBC actually said that 'planning for housing is obtained first, and the infrastructure will follow'. What rubbish! So, to my next point:

If you wish to add housing, what about roads? Newark Lane (and therefore central Ripley) is an appalling snarl-up every morning; make it one-way? Then what about the other way? Re-instate traffic lights at Burnt Common roundabout? Create a north-bound access to A3 to the south of that roundabout, to ease the pressure on Ripley? Add traffic lights to the A2215/Send Marsh road junction? Make the A247 through West Clandon a B road, so that you are then able to add traffic calming devices? It seems to me to be essential that all these points need to be considered before you begin to add more houses, yet no mention of any of these points ever appears in what we read.

Houses, please, not travellers' pitches or industry. Industry can be added to Slyfield,

[Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the way that a “need” for student accommodation has been added to the “housing need” figure of 13,860 - a fluctuating figure as students only need the housing for 8 months of any year and in any case have no intention of living in the villages. Housing of this nature should be located on what is a very spacious University Campus where I am sure much of the revenue would be directed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1479  Respondent: 10920961 / Mark Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to the 2016 Draft Local Plan and the limited consultation period. I do not believe that Guildford Borough Council have followed the correct process and I object to the last minute inclusion of new sites with less than 2 weeks notice.

I strongly object to the removal of the villages of Ripley, Clandon and Send from Green Belt protected status. I believe you have no basis to do that and that it will permanently destroy the identity of our villages, making roads through and surrounding those villages permanently congested.

I particularly object to the idea that the plan will being to effectively merge all the villages along the A3 from the M25 to the Hogs Back. It will destroy the open amenity of the borough and further congest the A3. This road is regularly a source of gridlock and this already has a detrimental effect on surrounding roads as vehicles search to find alternative routes. As a resident in Send I regularly witness major traffic hold-ups on the Send Road which acts as a link between Guildford and the A3 and Woking. The photos are a typical sight during rush hour in Send NOW and will only get worse.

I object to the planned building of 400 houses and the industrial site on the Green Belt at Garlick's Arch site at Burnt Common, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances - I understood that Green Belt land is intended to be considered an all but permanent demarcation; it is not meant to be a temporary arrangement subject whims of a local council.

I feel particularly strongly about (against) the development of 45 houses at Clockbarn Nurseries as I work at the offices further along Tannery Lane. The road is clearly little more than single track in places and even at 30mph (the signage currently used) is dangerous to pedestrians walking up and down it, with limited paving available at the head of the road only. At the entrance to Tannery Lane a combination of residences and a motor business mean that a number of vehicles can regularly be seen parked on both sides of the Lane,as indeed are they often along Send Road. This is a very often a very difficult junction to get in and out of during the working week and would be made much worse by the addition of 64 houses. In the opposite direction the road is much more of a single track, with little opportunity of expansion. This really hasn't been thought through at all. Given that I believe planning permission has already been granted for the Marina along Tannery Lane - which will undoubtedly generate traffic - I do not see this as at all feasible.

The huge development at Garlick's Arch is also poorly planned. Aside from the area having a particular conservation sensitivity , covered as it is in ancient woodland, the site is prone to flooding. The idea of putting 7000 sqm of industrial
space there seems particularly inappropriate, especially with the nearby Slyfield site still relatively under-utilised and with space available.

During the planning meeting held in Send recently a number of speakers decried the 'solution' being offered for development of the A3 in this area. Apparently the new interchange would offer nothing to route traffic away from those roads in the vicinity which currently direct traffic to the A3. Indeed this interchange would serve only to further burden the roundabout complex at Burnt Common.

I object to the way that a "need" for student accommodation has been added to the "housing need" figure of 13,860 - a fluctuating figure as students only need the housing for 8 months of any year and in any case have no intention of living in the villages. Housing of this nature should be located on what is a very spacious University Campus where I am sure much of the revenue would be directed.

As if Send wasn't already the target for some pretty ridiculous development plans, GBC have now come up with an idea of squeezing in additional properties at Send Hill. This is a popular spot amongst local residents for dog walkers and ramblers and the community has worked hard to make this little space a genuine amenity to local people. The site is not large enough for the proposed use. Send Hill is a single track country road and too narrow to provide sufficient access to the site or accommodate the potential new levels of traffic the proposed development would bring.

I object to the proposal in the local plan on the grounds that it would impact the nature reserve nearby. The proposed site is a quality green belt amenity area within countryside and would be spoilt forever by development. I object to the proposal in the local plan on the grounds that the proposed number of houses potentially could result in a significant number of extra cars in Send Hill which already suffers from congestion on occasion, especially with parents doing the school run.

It seems to me that GBC is determined to target Send as a site for development. It is palpably not suited to such plans as anyone who is prepared to visit the village at rush hour would witness. Send is a pleasant village to those who currently live there but with its amenities are already stretched as its stands (transport, doctors surgery and schools). As residents of Send we are equally determined to stand fast in our objection to ill considered further development and strive to protect the area we call home. It has a rich heritage, its Green Belt status has attracted a loyal following who have paid a premium to retain its beauty. We will continue to do so.

Finally, could you please confirm receipt of my objections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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houses. In the opposite direction the road is much more of a single track, with little opportunity of expansion. This really hasn’t been thought through at all. Given that I believe planning permission has already been granted for the Marina along Tannery Lane - which will undoubtedly generate traffic - I do not see this as at all feasible.

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Attached documents:

Comment ID: PSLPS16/8316  Respondent: 10920961 / Mark Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The huge development at Garlick’s Arch is also poorly planned. Aside from the area having a particular conservation sensitivity, covered as it is in ancient woodland, the site is prone to flooding. The idea of putting 7000 sqm of industrial space there seems particularly inappropriate, especially with the nearby Slyfield site still relatively under-utilised and with space available. During the planning meeting held in Send recently a number of speakers decried the ‘solution’ being offered for development of the A3 in this area. Apparently the new interchange would offer nothing to route traffic away from those roads in the vicinity which currently direct traffic to the A3. Indeed this interchange would serve only to further burden the roundabout complex at Burnt Common.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2254  Respondent: 10920961 / Mark Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As if Send wasn’t already the target for some pretty ridiculous development plans, GBC have now come up with an idea of squeezing in additional properties at Send Hill. This is a popular spot amongst local residents for dog walkers and ramblers and the community has worked hard to make this little space a genuine amenity to local people. The site is not large enough for the proposed use. Send Hill is a single track country road and too narrow to provide sufficient access to the site or accommodate the potential new levels of traffic the proposed development would bring.

I object to the proposal in the local plan on the grounds that it would impact the nature reserve nearby. The proposed site is a quality green belt amenity area within countryside and would be spoilt forever by development. I object to the proposal in the local plan on the grounds that the
proposed number of houses potentially could result in a significant number of extra cars in Send Hill which already suffers from congestion on occasion, especially with parents doing the school run.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4911  Respondent: 10920961 / Mark Stevens  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I particularly object to the idea that the plan will being to effectively merge all the villages along the A3 from the M25 to the Hogs Back. It will destroy the open amenity of the borough and further congest the A3. This road is regularly a source of gridlock and this already has a detrimental effect on surrounding roads as vehicles search to find alternative routes. As a resident in Send I regularly witness major traffic hold-ups on the Send Road which acts as a link between Guildford and the A3 and Woking. The photos are a typical sight during rush hour in Send NOW and will only get worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4910  Respondent: 10920961 / Mark Stevens  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the removal of the villages of Ripley, Clandon and Send from Green Belt protected status. I believe you have no basis to do that and that it will permanently destroy the identity of our villages, making roads through and surrounding those villages permanently congested.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4912  Respondent: 10920961 / Mark Stevens  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the planned building of 400 houses and the industrial site on the Green Belt at Garlick’s Arch site at Burnt Common, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances - I understood that Green Belt land is intended to be considered an all but permanent demarcation; it is not meant to be a temporary arrangement subject whims of a local council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It seems to me that GBC is determined to target Send as a site for development. It is palpably not suited to such plans as anyone who is prepared to visit the village at rush hour would witness. Send is a pleasant village to those who currently live there but with its amenities are already stretched as its stands (transport, doctors surgery and schools). As residents of Send we are equally determined to stand fast in our objection to ill-considered further development and strive to protect the area we call home. It has a rich heritage, its Green Belt status has attracted a loyal following who have paid a premium to retain its beauty. We will continue to do so.

Finally, could you please confirm receipt of my objections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  📜 IMAGE 1.jpg (1.1 MB)
                      📜 IMAGE 2.jpg (953 KB)

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Objections to the SEND 2016 Draft Local Plan

I wish to object to the 2016 Draft Local Plan and the limited consultation period. I do not believe that Guildford Borough Council have followed the correct process and I object to the last minute inclusion of new sites with less than 2 weeks notice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to the Policy A42 change at Clockbarn in Tannery Lane. It now appears that you are planning to build sixty homes instead of the 45 originally suggested. This is a 33% increase instead of a reduction which would suit that particular site. Sixty houses are far too many. It will ensure that current traffic problems in Tannery Lane are made even worse and the extra surface water will add to the potential flooding problems which exist.</td>
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<td>I object to Policy A58 at Burnt Common. An industrial development here is not required when there are empty sites and industrial units at Slyfield and in Guildford.</td>
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<td>10921025 / Tony Allen</td>
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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I object to Policy 2 at paragraph 4.3.15. I do not think Send Business Park should be inset from greenbelt land. It is in a beautiful quiet rural lane in an area of outstanding natural beauty which is why we all have chosen to live and work here. There is highly restricted vehicular access along Tannery Lane in both directions and as it is. This is, and should remain an area of outstanding beautiful countryside adjacent to the Wey Navigation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I write to voice our objections to the development plan for the Horsleys. The plan to develop a massive 593 new houses in the area over the next 5 years seems to be out of proportion with the national estimate for population growth. It will have a detrimental affect on schools and medical facilities and will massively change the feel of the green belt area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I object to Policy 2 at paragraph 4.3.15. I do not think Send Business Park should be inset from greenbelt land. It is in a beautiful quiet rural lane in an area of outstanding natural beauty which is why we all have chosen to live and work here. There is highly restricted vehicular access along Tannery Lane in both directions and as it is. This is, and should remain an area of outstanding beautiful countryside adjacent to the Wey Navigation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I am writing to strongly object to your proposal to include the above application for 2,000 new dwellings within your local plan at the site of the former Wisley Airfield.

This site comes under the Metropolitan Green belt and I am not aware of any circumstances that justify its removal from it. The whole point of the Green belt is that it is protected land to prevent the spread of urban development destroying the natural countryside not to mention harming already endangered wildlife and ecologically sensitive areas that have been damaged by increased levels of traffic and subsequent pollution.

The addition of this development will have a severe impact on the already congested rural lanes and roads around the area, not to mention severely burden the small villages and station car parks already struggling to accommodate the high levels of parking required. There is already an application in place for RHS Wisley which will increase visitor traffic and this will be compounded by an additional 2,000 dwellings adding what could be as many as 4,000 cars to the road network, bearing in mind many modern homes and families have at least 2 cars per household, if not more.

I urge the Planning Committee to consider the detrimental affect a development of this magnitude will have on this rural area and the environment and reject the application forthwith.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/4116  Respondent: 10921057 / D M Deacon  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the figure of 693 new homes per annum being used as a basis for planning. As I understand, no evidence has been made available to substantiate this or if it has, it has not been made public at the time of launch of the Draft Local Plan. This is unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7681  Respondent: 10921057 / D M Deacon  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Site A43 – I object to the proposal of potentially 400 Homes and 7000 sq m of industrial and warehousing use. I object on 3 grounds as follows:-

The number of 400 is completely out of proportion to the Send area existing population.

   The infrastructure is already inadequate as detailed for Site A43a.

   The site includes a large area of ancient woodland which cannot be replaced.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7680  Respondent: 10921057 / D M Deacon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A43a - I object to the proposed new northbound slip roads. The volume of traffic at present using the A247 is already excessive both morning and evening with extensive traffic queues in both direction on the A247 creating significant pollution and the use of rat runs attempting to avoid the queues. New slip roads can only increase this as traffic attempts to join and leave the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17006  Respondent: 10921057 / D M Deacon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of large areas of villages from the Green Belt. I moved to this area because the area was protected by the Green Belt from excessive development. The villages are vital to the health of Guildford as a borough maintaining the rural feel of the borough. Green Belt status should not be removed from any area without full examination of alternative sites to meet the exceptional need of the development. Removing the status removes the requirement to carry out this examination. The character of the villages within Guildford Borough boundary do make a significant contribution to the openness of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/102  Respondent: 10921185 / Yvonne Harrington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (

I object to the lack of any evidence for the alleged housing need numbers

I object to the lack of any provision for new schools. Every year children from the villages of Send and Ripley are being sent to schools miles away from home. This leaves parents in the impossible position of travelling miles to school and some inevitably with very long journeys, how can this be good for the child not withstanding the carbon impact it has.

I object to the fact that the Doctors surgeries in the area are already stretched and there does not appear to be any immediate provision for this to be rectified.

I object to the planned new on/off ramp on the A3 traffic is already horrendous through the village and there only has to be an accident anywhere near the M25 junction for a vast amount of cars to exit the A3 and drive through the villages to try and beat the traffic. On some mornings it is a horrendous experience just trying to get out onto the Portsmouth Road in Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/100  Respondent: 10921185 / Yvonne Harrington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing to lodge my objections to the draft local plan 2016.

I object to the removal of villages including Send, Ripley and Clandon from Green Belt. This simply seems to be an attempt to get a foot in the door for future mass scale building which I would advocate is not needed.

I object to any erosion of Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/101  Respondent: 10921185 / Yvonne Harrington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to what seems to be a disproportionate amount of development in one area of the Borough. These plans will have a negative effect on the villages which would lose their identities essentially it appears that they would merge into one big sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/111  Respondent: 10921185 / Yvonne Harrington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the last minute inclusion of new sites with less than 2 weeks notice and with very limited consultation time giving residents very little time to object. One could almost go so far as to suggest that this last minute inclusion in particular the site at Garlicks Arch where hundreds of houses are suggested is underhanded. Why have these sites now suddenly been added, why were they not included in the last draft plan. How can the council seem to simply appear to keep changing their minds regarding sites. Is it on the basis that if you do it often enough people will get fed up having to lodge objections, get worn down by the whole process thus leaving the council a clear path to build!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to object to your local planning policy. My objection is to the 2016 Draft Local Plan

• I object to all erosion of the Green Belt
• I object to any “in setting” (ie removal) of any villages from the Green Belt
• I object to the disproportionate amount of development in one area of the borough.
• I object to the limited consultation period
• I object to last minute inclusion of new sites with less than 2 weeks’ notice. This is a devious way of conducting business
• I object to the lack of any evidence for the alleged housing need numbers
• I object to the lack of immediate provision for new schools
• I object to the lack of any immediate provision for doctors surgeries
• I object to the 40 houses and two travellers pitches at Send Hill. This land is not fit for anyone to live on as it is landfill land and I believe has asbestos buried in it
• Also who on your council would have travellers pitches next to their houses? The truth is none! Examine your consciences please

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Objection to Site A22

The fields by Keens Lane, in the Guildford Borough Council Draft Local Plan for the development of a care home plus 140 homes should be removed for the following reasons;

1. The fields are Green Belt and must be protected because once you have built on the land there is no going back.
2. We have families of deer in the field and they follow a path back and forward across the field on a daily basis. It would be a great shame to lose this beautiful sight.
3. Keens Lane is too narrow to support the extra traffic, it’s already quite dangerous for our children to walk
down going to get the school bus in the morning/afternoon so with extra traffic you could be looking at fatalities.
Do you want this to happen!

4. The roads going into Guildford from this end of town are too narrow to support a bus lane and cannot support the extra traffic that the new homes would bring.

3. All these new houses would be too close to Whitmoor Common which is a Site of Special Scientific Interest.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2833  Respondent: 10921633 / Emma Loosley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2834  Respondent: 10921633 / Emma Loosley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough, Send has not been properly consulted and all its sites have been changed substantially.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5854  Respondent: 10921633 / Emma Loosley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5853  Respondent: 10921633 / Emma Loosley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development at Garlick’s Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks’ notice and without any prior consultation and is not required in terms of housing need either for the village or the borough.

I object to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space.
from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available.

I object to the development at Garlick’s Arch because the site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The site is also subject to flooding.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/5852  **Respondent:** 10921633 / Emma Loosley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the (A247) would be gridlocked all day.

I object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/5855  **Respondent:** 10921633 / Emma Loosley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<td>I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford.</td>
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<tr>
<td>I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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</table>
I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp173/268  Respondent: 10921633 / Emma Loosley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to inset Send Business Park from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2288  Respondent: 10921633 / Emma Loosley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the Policy A42 change at Clockbarn in Tannery Lane because:

- The increase to 60 homes in place of 45 homes is **33% more** and too much
- It ignores all the **hundreds of previous objections** made by local people
- It will worsen access and traffic problems in Tannery Lane and at the A247 junction
- It will make erosion of the Green Belt in our village worse
- It will make surface water flooding, which is already bad, even worse
- It will impact open countryside views from the River Wey Navigation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:  pslp172/2289  Respondent: 10921633 / Emma Loosley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43 change at Garlick’s Arch because:

- It ignores all the **thousands of previous objections** made by local people
- There is no proven demand for Travelling Showpeople plots in this location
- It is beautiful permanent Green Belt and no “exceptional circumstances” exist
- It will cause over-development of our village and the number of homes is excessive
- It is exquisite ancient woodland that existed at the time of Elizabeth 1
- It will join up Ripley and Send and defeat the key purpose of Green Belt
- It is subject to frequent flooding and is currently a flood zone 2 allocation
- It is contaminated by lead shot accumulated over fifty years
- It will generate excessive traffic that will block up the local roads of Send and Ripley+

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:  pslp172/2291  Respondent: 10921633 / Emma Loosley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A58
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A 58 at Burnt Common because:

- It was deleted from the 2014 draft because of all the objections made previously
- The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land
- There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt
- The impact on small surrounding roads will create traffic gridlock
- It will join up existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/9  Respondent: 10921793 / Rachel Vowles  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing with my objection to the new local plan affecting the village of Send.

I have written previously to object, and I do not feel that this plan addresses any of the issues that I raised at that point.

The village is currently overwhelmed with traffic at peak times during the day, and any further traffic, in particular larger vehicles and lorries, will bring the roads to a standstill. There are many residents required to park on the road side which means it is very difficult for cars to pass at times, nevermind industrial vehicles. Even more worryingly, with 2 schools and a park on the main village road, I am surprised by the current lack of speed restrictions and protection to those walking on the pavements or needing to cross the road - this will only get worse as the number of cars increases potentially by 2x the numbers of house you are proposing. I already do not feel safe walking along the pavements in the village with my children as they are very narrow and the volume and speed of traffic is an accident waiting to happen, of which I have heard of many near misses from other parents at the school. The additional traffic will not only cause issues to the main road through Send but also the narrow lanes around the village in particular Send Hill.

The amenities in the village will also not be able to cope with the increased population. It is already incredibly difficult to get a doctors appointment at the Villages Medical Centre, and you are proposing 1000+ additional residents.

Finally, I'm objecting in regards to the proposal to build on greenfield space when there are brownfield sites available that should be considered ahead of spoiling the countryside that makes this county so special.
I am writing to strongly object to the new Local Plan and in particular the proposal to remove the Horsley’s from the Green Belt.

I can see no sound reason for the Horsley’s being included in an urbanisation of land outside the M25. This is wholly inappropriate and unjustified. The Horsley’s have from early times been a rural village and in the 1920’s developed into a rural retreat with dormitory accommodation for London business workers.

The village infrastructure is unable and unsuited to support any further expansion.

1. The transport links are at capacity
   1. The trains into London are full to capacity well before they reach their destination at commuter times and the train companies keep extending the travel times to London in order to meet the timetable.
   2. The train station car park is full to capacity already and there is no scope for increasing capacity.
   3. The M25 from junctions 8 to Heathrow and beyond to the M40 are some of the most congested roads in the country and increasing housing supply at or near junction 10 at the Horsley’s, Wisley, Burpham and Clandon is wholly inappropriate and ill conceived.
   4. The Local roads are unsuitable for increased capacity. The B2039 Ockham road north and South is already too narrow for existing traffic with pinch points at Bishopsmead Parade, Conisbee’s butchers and just south of Station Parade and before Forest Road on Ockham Road South where traffic is reduced to single file if a lorry or coach is on the road. Furthermore the Rail Bridge on Ockham road south has recently been the subject of a Lorry collision as it is a low bridge.

2. The Village infrastructure is already stretched to capacity.
   1. The local state schools are at capacity the Raleigh and the Howard of Effingham. There is no longer a guarantee that parents resident in the Horsley’s wanting their children to attend these schools are able to get them enrolled.
   2. The Medical centre is already at capacity and there is inadequate parking for patients.
   3. The local shops on Station parade have insufficient car parking capacity for existing residents and there is no room for expansion of parking facilities.

3. The proposed increases in capacity have not been thought through correctly. A 35% increase in housing capacity exceeds the increase of any other borough. This combined with the proposed developments in neighbouring areas of Wisley, Burpham, Clandon and Effingham is wholly inappropriate and unsustainable for both Local infrastructure and the National M25 that serves the area. We do not need to urbanise our Greenbelt and gridlock our countryside, when high speed rail networks can spread the population expansion away for the already overcrowded South East.

I strongly object to the Local plan for 2016.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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**I OBJECT to the building of 45 houses at Clockbarn Nursery** because of the inadequate access and increased traffic volume. Tannery Lane is far too narrow and winding, with limited passing places and visibility, to take any further traffic loads. The junction with Send Road is already over-crowded and hazardous both when turning in to Tannery Lane, or exiting on to Send Road. Planning permission has already been granted for 64 apartments at the Tannery and for building the Marina, both of which will already create additional burdens on the tiny lane and its traffic load and further development will only exacerbate this situation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/7426  **Respondent:** 10921921 / V Groves  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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**I OBJECT to the building of 7000 sq metres of industrial space and 400 houses at Garlick’s Arch opposite Send Marsh Road.** The site floods regularly and is covered by ancient woodland, up to 500 years old, which is home to a variety of wildlife. The industrial space is not required and the additional heavy loads of commercial traffic will need to pass through Ripley village in order to gain access to the A3 and M25. There is already provision for commercial space at Slyfield industrial estate and this should be fully developed before additional sites within Green Belt locations are used. With regards to the 400 houses at Garlick’s arch, the currently existing brownfield sites within Guildford and its surrounding areas should be fully utilised before any housing is agreed within Green Field sites. Guildford has refused to share the methodology behind calculating the upcoming housing requirements and therefore no weight should be given to the use of these calculations when planning additional housing capacity.

**I further OBJECT to the development at Garlick’s Arch for 400 houses because** it was sprung on the village at the last moment with only 2 weeks’ notice and without any prior consultation and is not required in terms of housing need either for the village or the borough.

**I further OBJECT to the proposed industrial development of 7,000 sq m at Garlick’s Arch because** it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to a new interchange with the A3 at Burnt Common. Send would need to accommodate the traffic for the proposed 2000 new houses at Wisley Airfield, 2000 new houses at Gosden Hill, Burpham as well as the 1850 proposed new houses at Blackwell Farm. Much of the traffic between these sites, the A3 and M25 would need to pass through the already congested roads in Send and Send Marsh, which are already overloaded with existing local traffic. Noise and pollution levels within Send and Send Marsh are already at excessive levels and the proposed interchange would only worsen this situation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the development of 40 houses and 2 Travellers’ pitches at Send Hill. It is an inappropriate location because the narrow width, single access country road provides insufficient access. The subsoil of the proposed site contains documented unsafe landfill waste registered at GBC. Any development of this site would spoil a high amenity area set in beautiful countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the fact that infrastructure requirements have not been properly considered at any point in this proposed Local Plan, and are inadequate to deal with proposed increase in housing levels. Roads, public transport, availability at doctor’s surgery and places within schools will be unable to cope with the increase in housing and population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16522  Respondent: 10921921 / V Groves  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6282  Respondent: 10921921 / V Groves  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Send Village being removed from the Green Belt. The Green Belt was intended to be permanent, as required by the National Planning Policy Framework, and there are no special circumstances to justify abandoning it. Send’s Green Belt provides an essential buffer stopping Woking and Guildford becoming one large conurbation. Local councillors and central government gave a clear election promise to protect the Green Belt and this plan reneges upon that election promise. Developers will be quick to take advantage of the removal of Send from the Green Belt and then there will be nothing to stop further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I OBJECT to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.</td>
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I object to building 45 houses at Clockbarn Nursery because of inadequate access and traffic. The junction of Tannery Lane with Send Road is even now extremely dangerous with heavy lorries accessing Send Business Park. Tannery Lane is very narrow and winding, there are no hard paved footpaths on the roads leading to this site including Tannery Lane, Papercourt Lane and Polesden Lane, so the elderly and those with prams have to walk on the road dodging traffic. Permission has already been unfortunately granted for a Marina and 64 apartments both of which, when built, will further increase traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to a new interchange with the A3 at Burnt Common. Due to the proposed developments in the area; of some 6300 dwellings and 7000 sq metres of industrial space, this new interchange will increase traffic in the Parish considerably. The road infrastructure around Send is just not adequate even under present conditions. It would mean grid lock on most roads around Send particularly on Send Road, Polesden Lane and Sendmarsh Road. We were assured by Councillors from Guildford at a recent Local meeting that the local road infrastructure would be improved to accommodate the extra traffic however the funds that were stated for this work were wholly inadequate and in any event the present road widths cannot be widened [which in my view would be necessary] due to existing houses on each side.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to building 400 houses and 7000 metres of industrial space at Garlick's Arch, opposite Sendmarsh Road. The ancient woodland will be affected and the area is subject to flooding. The industrial space is not needed and in fact some industrial units on Polesdon Lane are currently vacant. Such space should be allocated to brown field sites for example at Slyfield. The increase in population due to this development will overwhelm the Parish schools and medical facilities and as already mentioned the additional traffic will cause traffic jams particularly at peak times as well as being harmful to the health of those living next to the main highways.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/3573</th>
<th>Respondent: 10922017 / Arthur Thomas</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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</table>

I do not believe that the housing requirements for Guildford have been properly calculated and I understand, have refused to disclose their calculations. It is my belief that there is sufficient brown field sites in and around Guildford that can accommodate much of the housing needs and priority should be given to these sites first.

I am also dismayed and puzzled why Guildford BC should take many months to announce a plan for the parish and then within a few weeks re-issue it with many more dwellings allocated to the Parish and with an extremely short period for the public to comment. As far as I know there has been no explanation for this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/3558</th>
<th>Respondent: 10922017 / Arthur Thomas</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
1. I object to Send Village, inclusive of Send, Sendmarsh and Burnt Common communities, being removed from the Green Belt and the loss of the protection from development that this I see no special circumstances to abandon this essential space which provides a haven for wildlife, space for outdoor pursuits, green lungs for those who live here and a buffer to the ever outward spread of Guildford and Woking: Local Councillors and the Conservative Government gave a clear election promise to protect the Green Belt and they should be held to this pledge.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2866  Respondent: 10922017 / Arthur Thomas  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A42 change at Clockbarn in Tannery Lane because:

- There is an increase in the number of homes now planned which ignores previous objections raised by local people, that there should be no development at all on this site.
- It worsens access and traffic problems in Tannery Lane and at the junction with Send Road.
- It will spoil the views of the countryside especially along the River Wey and further reduce the Green Belt around the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2867  Respondent: 10922017 / Arthur Thomas  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43 change at Garlick’s Arch because:

- It ignores previous objections raised by local people.
- It is in permanent Green Belt and no ‘Exceptional Circumstances’ exist.
- It will cause overdevelopment of the villages of Ripley and Send and the number of homes is excessive.
- It will join up Ripley and Send and defeat the Key purpose of Green Belt.
- It will create excessive traffic that will block up the local roads.
The infrastructure of schools, medical facilities, roads, etc have difficulty coping with the present level of population without having the further burden of additional homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2868  **Respondent:** 10922017 /  Arthur Thomas  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43 change at Garlick’s Arch because:

- It ignores previous objections raised by local people.
- It is in permanent Green Belt and no ‘Exceptional Circumstances’ exist.
- It will cause overdevelopment of the villages of Ripley and Send and the number of homes is excessive.
- It will join up Ripley and Send and defeat the Key purpose of Green Belt.
- It will create excessive traffic that will block up the local roads.
- The infrastructure of schools, medical facilities, roads, etc have difficulty coping with the present level of population without having the further burden of additional homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2901  **Respondent:** 10922177 /  Paul Knight  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed Infrastructure Schedule (Appendix C)

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPA16/3480</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</table>

10. I object to the proposed Infrastructure Schedule (Appendix C)

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/2900</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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9. I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as to how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/5957  Respondent: 10922177 / Paul Knight  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the inclusion of the land at Garlicks Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the the Draft Local Plan Infrastructure schedule does not provide for this site at all.

I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6769  Respondent: 10922177 / Paul Knight  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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6. I object to the inclusion of the land at Garlicks Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the the Draft Local Plan Infrastructure schedule does not provide for this site at all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5. I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14447  Respondent: 10922177 / Paul Knight  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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8. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14449  Respondent: 10922177 / Paul Knight  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
12. I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/12065</th>
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| I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1) |
| This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

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<th>Comment ID: PSLPP16/12074</th>
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</table>

| I object to the lack of proper infrastructure planning for sites (Policy I1) |
| The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools? |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |
3. I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

13. I object to the lack of proper infrastructure planning for sites (Policy I1)

The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the congestion that development will cause to the trunk roads A3/M25 (Policy12)

Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14451  Respondent: 10922177  Paul Knight  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

14. I object to the congestion that development will cause to the trunk roads A3/M25 (Policy12)

Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12072  Respondent: 10922177  Paul Knight  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to poor air quality concerns (Policy 13)

The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/14448  Respondent: 10922177 / Paul Knight  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

11. I object to poor air quality concerns (Policy 13)

The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12063  Respondent: 10922177 / Paul Knight  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14443  Respondent: 10922177 / Paul Knight  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
2. I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12066  Respondent: 10922177 / Paul Knight  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14445  Respondent: 10922177 / Paul Knight  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12056  Respondent: 10922177 / Paul Knight  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the local plan as the development proposed is not sustainable (Policy S1)

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14442  Respondent: 10922177 / Paul Knight  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the local plan as the development proposed is not sustainable (Policy S1)

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12068  Respondent: 10922177 / Paul Knight  Agent:
I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the planned development of sites 46 & 47 within the GBC Local Plan. Please consider the following points below:

I can’t see any evidence from either the GBC or SCC that there is a requirement, all the surrounding schools are undersubscribed (Kings 57% undersubscribed and Ash Manor has spaces for an additional 110 places) – I am sure you have seen the detailed report compiled by Keith Witham which offers you a full breakdown of all the surrounding schools.
Also I can’t believe all these children would travel to the school (as suggested) using the train hence yet another increase in traffic congestion at peak periods of the day within the village.

The case for a New Secondary School in Normandy has not been proven.

2) Transport & Roads.
This site is bounded by the D60 (Glaziers Lane), the C16 (Wanborough Hill and Westwood Lane) and the A323 (Guildford/Aldershot Road)
I can’t see any evidence within the plan, or how these roads could be improved to accommodate the increase in traffic, the village would be gridlocked during most of the day.
Both railway bridges within the village were never intended to handle this amount of traffic and would have real safety issues with lack of visibility and are potential accident hot spots.
There would have to be sufficient road improvements e.g. provision of footpaths and street lighting to improve the overall safety of the road infrastructure.

3) Environmental Issues.
Normandy and Flexford areas has a high water table and is a known area for flooding, and much of this site is water logged, with a number of local residents already experiencing sewage back flow in periods of high rainfall.
My main concern is the impact on the wild life with a number of species habiting in this area including Hedgehogs, Dormice, Great Crested Newts, Barn Owls, Stag Beetles, Skylarks, Common Toads, Common Lizards, Grass Snakes, Adders, Slow worms, Badgers and Bats and the protection of a number of veteran and mature oaks and other trees across the proposed development site.

4) Doctors Surgery
There has been no mention of additional services to accommodate the additional 1100 houses, currently both surgeries Normandy and Fairlands are at full capacity, obtaining an appointment is currently a challenge and would become very difficult once this site has been developed.
I do hope that you take all my considerations seriously as this has a huge impact not only on the people of Normandy and Flexford but also all the surrounding villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
2. 45 houses at Clockbarn Nursery

I object to the building of 45 houses at Clockbarn Nursery. Tannery Lane is far too narrow to take any more traffic and will only lead to even further congestion on to Send Road. I live further along Send Road and can confirm that this road is already over its maximum capacity of traffic. Every day traffic is at a ‘stand still’ outside my house and I have to endure the fumes. Many times in one week I have to wait patiently to be allowed out of my drive. Also our school and doctors’ surgery are already over stretched.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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400 houses and 7000 sq metres of industrial space at Garlick’s Arch

I object very strongly to this development. I cannot believe that anyone would suggest such an enormous development on this land. There seems to be no joined up thinking here. The A3, the M25 and Send Road already grind to a halt many times each day simply because of the sheer volume of traffic. This not only causes delayed journeys but also air pollution from stationary cars. Such an enormous development can only exacerbate the problem as well as cause other pressures on our village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
5. New interchange with the A3 at Burnt Common

I strongly object to this development. It can only increase the traffic using Send Road from the A3 and the M25. We cannot tolerate any more traffic jams outside our house. It is already unbearable.

I would like to know if there is any facility for me as a Deaf BSL user to express my concerns to these issues using my own language of BSL? BSL is one of the UK languages. I have had to pay a communication support worker to write this letter for me as I am not comfortable using English.

Please confirm receipt of this letter and also ensure that it is shown to the Planning Inspector responsible for decisions on this matter.

I will be forwarding this letter to my MP.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2824  Respondent: 10922689 / Kathleen Grehan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. 40 houses and 2 travelers’ pitches at Send Hill

I object strongly to this development. Send Hill is another country lane that cannot take any more traffic. It is already impossible to drive up Send Hill during school drop off and pick up times. Also the site itself is an old general waste landfill site. Surely it is not wise to build on such a site? The footpath that goes through the site is very widely used and is an exceptionally pretty part of our village. Two travelers’ pitches seem strange. To my knowledge travelers’ enjoy being in larger sites with other travelers. Also this is an exceptionally small area for such a development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/6228  Respondent: 10922689 / Kathleen Grehan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Objections to the Local Plan

I live in the village of Send and I should like to object very strongly to the following issues in the Local Plan:

1. Removing Send from the Green Belt

I object most strongly to the idea of removing Send from the Green Belt. I do not believe that you have the right to do this as Green Belt, by its very definition, is meant to be a permanent feature and protected from property developers. There are no ‘exceptional circumstances’ that require you to remove this status especially when there are a number of undeveloped Brown Field sites in the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/4512</th>
<th>Respondent: 10922913 / Henry Dowson</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
| 1. | I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches |
| 2. | It ignores all the thousands of previous objections made by local people |
| 3. | There is no demand for travelling show people plots in this location |
| 4. | There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints. |
| 5. | The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required. |
| 6. | This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it. |
| 7. | The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy. |
| 8. | Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided. |
| 9. | The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result. |
| 10. | I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached. |
| 11. | I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding... |
is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site
will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4514  Respondent: 10922913 / Henry Dowson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17/2946  Respondent: 10922913 / Henry Dowson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/572  Respondent: 10922913 / Henry Dowson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3015  Respondent: 10922945 / Toby Meredith  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43) being taken out of the Green Belt and used for development. Government states that need for housing is not an ‘exceptional circumstance’ and therefore there are NO exceptional circumstances to allow building on this site.

I object to the total lack of consultation and last minute addition of (A43) Garlick’s Arch. This came as a complete shock to local residents.

I object to development on the Garlick’s Arch (A43) site as it has wildlife and ancient woodland which has not been taken into account.

I object to development on the Garlick’s Arch (A43) site as it is prone to flooding and therefore unsuitable to build on.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3017  Respondent: 10922945 / Toby Meredith  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to a new proposed industrial site at Garlick’s Arch (A43). It is not needed and there is already room for the proposed 7,000m² at Slyfield where it is already set up for industrial purposes.

I object to removing Send, Ripley, Clandon, Galick’s Arch (A43), Wisley Airfield (A35) and Gosdon Farm (A25) all from the Green Belt as it would produce an unwanted urban sprawl. There are no exceptional circumstances for these being removed, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3016  Respondent: 10922945 / Toby Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed new on/off ramps at Burnt Common (A43a) as it would cause MAJOR congestion to Send, Ripley and Clandon. These minor roads are already congested at busy times of the day. This proposal would bring a disproportionate amount of through traffic travelling to the A3 and the M25. The roads are not capable of sustaining this increase.

I object to the new on/off ramps at Burnt Common (A42a) as the ensuing large amounts of traffic would make the local roads hazardous to the local community due to the lack of paths and cycle lanes. We already have extra cyclists using the small country lanes and roads in this area all the time now since the Olympics and many people visit this area to walk.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3018  Respondent: 10922945 / Toby Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development of 40 houses and 2 Travellers pitches at Send Hill (A44) because this site is totally new, was not proposed before and has had no consultation beforehand.

I object to the development of 40 houses and 2 Travellers pitches at Send Hill (A44) because the site is in beautiful Green Belt land which should not be developed on.
I object to the development of 40 houses and 2 Travellers pitches at Send Hill (A44) because access is gained from a small single track country road which is totally inappropriate for regular heavy use.

I object to the proposed development at Send Hill (A44) as it is documented as being unsafe with land fill waste currently being vented.

I would like these objections to be fully taken into consideration and that the Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6514  Respondent: 10922945 / Toby Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Consequently there is obviously no room for all the extra traffic and people these developments will produce.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6516  Respondent: 10922945 / Toby Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to GBC ignoring the problem of lack of infrastructure in the Send, Ripley, Clandon, Garlick’s Arch (A43), Wisley Airfield (A35) and Gosdon Farm (A25) areas. The existing infrastructure is poor because:-

1. **Roads.** Our small country roads and lanes are narrow (some single track), have no footpaths and are in poor condition. They are already prone to congestion in some areas (e.g. Send, Ripley and Clandon). The resulting huge amount of extra traffic that these developments will produce will be a total disaster and make the area very dangerous to travel, by car or otherwise.

2. **Medical facilities.** The local medical facilities are already at full capacity and some are refusing new patients.

3. **Schools.** Local schools are oversubscribed and some local children already have to travel out of the area to go to school.

4. **Public transport.** Bus routes are few and far between and often cancelled. The small local stations are always overcrowded and car parking is over spilling into residential roads.
Consequently there is obviously no room for all the extra traffic and people these developments will produce.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6517  Respondent: 10922945 / Toby Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a new proposed industrial site at Garlick’s Arch (A43). It is not needed and there is already room for the proposed 7,000m2 at Slyfield where it is already set up for industrial purposes.

I object to removing Send, Ripley, Clandon, Galick’s Arch (A43), Wisley Airfield (A35) and Gosdon Farm (A25) all from the Green Belt as it would produce an unwanted urban sprawl. There are no exceptional circumstances for these being removed, as required by the National Planning Policy. A43

I object to GBC not looking at brownfield sites first before trying to develop on Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1765  Respondent: 10923265 / Colin Lewis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1748  Respondent: 10923265 / Colin Lewis  Agent:
In summary the Horsleys should remain in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3439  Respondent: 10923265 / Colin Lewis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

I object also to the proposed development of Wisley Airfield.

Apart from proposals to add more house building in a village now bursting at the seams, the proposed development of Wisley Airfield with 2,000 houses makes a mockery of the planning and development process. What common sense if any is used to impose such a burden on communities that are barely coping now. The local infrastructure simply cannot cope.

Development of Wisley Airfield as proposed should be removed from the Local Plan. Common sense should prevail.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3470  Respondent: 10923265 / Colin Lewis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

I object also to the proposed development of Wisley Airfield.

Apart from proposals to add more house building in a village now bursting at the seams, the proposed development of Wisley Airfield with 2,000 houses makes a mockery of the planning and development process. What common sense if any is used to impose such a burden on communities that are barely coping now. The local infrastructure simply cannot cope.

Development of Wisley Airfield as proposed should be removed from the Local Plan. Common sense should prevail.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3471 Respondent: 10923265 / Colin Lewis Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars

b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads

c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements

d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)

e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest

f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through
the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7658  Respondent: 10923265 / Colin Lewis  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7536  Respondent: 10923265 / Colin Lewis  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I write to object to the proposal to remove East and West Horsley from the Green Belt and to extend the boundaries of the Settlement areas of the Horsleys, for the following reasons:

The Horsleys are villages that cannot cope with further developments that will increase the population. Facilities such as schools, shops, medical facilities are overloaded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7537  Respondent: 10923265 / Colin Lewis  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Traffic in the village and surrounding areas is heavily congested with a volume of vehicles through the village damaging road surfaces and too heavy for small country roads to cope with. They were certainly not built to carry 32 ton trucks which constantly damage trees and roadside vegetation because of their size and height. (Rail bridge was hit by a large lorry recently causing closure of Ockham Road through the village for several days, not for the first time).

The A3 and the B246 Guildford/Leatherhead Road for example, are almost daily at a standstill, as is the M25 intersection at Junction 10.

Parking in East Horsley has become impossible with no scope to ease the problem.

Commuters using the train service find the station car park full every day. Shoppers in East Horsley have great difficulty in parking and on occasion I have simply gone back home because I could not park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7655  Respondent: 10923265 / Colin Lewis  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7656  Respondent: 10923265 / Colin Lewis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2721  Respondent: 10923297 / Matthew Burnham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT ESPECIALLY TO 6 POLICIES: A36, A37, A38, A39, A40 & A41:

- Amount of new housing far exceeds local need.
- Housing density excessive when compared with existing development.
- Would transform the Horsleys into a sizable town, something for which no case is made.
- No local support.
- Collective impact of these 6 sites on a small part of the borough not considered. Should not be treated as isolated, separate sites.
- Total amount of new building out of scale with the planned development elsewhere the borough, especially less sensitive urban areas not protected by Green Belt.
- Sites unsustainable. Key infrastructure lacking. No adequate provision is made to increase it – e.g. poor wastewater capacity, lack of schools, absence of traffic management plan, flooding.
• No account taken of additional impact of Wisley Airfield site on Horsleys.
• Extension of settlement boundaries too permissive. Horsleys characterised by streets with development along only one side of the road. Policies allow too many adjacent green fields to be developed by squaring off boundaries and claiming they don’t contribute to Green Belt “openness”.
• Green Belt gap with neighbouring settlements hugely narrowed, especially if Wisley Airfield is built on.
• Will harm compliance with NPPF 81 – e.g. by making cycling (including Prudential cycle races) too dangerous, ruining the rural setting of Waterloo Farm campsite, destroying the ambience of Grange Park Opera’s new “Theatre in the Woods”.
• Policy A40 especially unviable because of high water table and poor drainage, leading to regular winter flooding.
• Safe access and egress at Site A40 unachievable, owing to flooding, high speed limits, poor sight lines, narrow access to existing properties, inadequate pavements for elderly and schoolchildren, increasing use by recreational cyclists etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT ALSO TO POLICY A35 (WISLEY AIRFIELD):

• Should not be in the plan for all the reasons the Planning Committee rejected the identical recent proposal by Wisley Investment Properties.
• Irregularity of including this policy in the plan 24 hours before this planning application was rejected (like extending the time allowed for the developers to present their application).
• Unacceptable Conservative Party links between the developers and the Council.
• No Green Belt “exceptional circumstances” presented.
• Not a brownfield site as stated – only 15% of it.
• Proposed SCC waste site ignored.
• Loss of farming land.
• Too near RHS Wisley and Thames Basin Heath SPA.
• SANG would harm on SPA.
• Will aggravate traffic jams at A3 roundabout and M25 Junction 10.
• Unacceptable increase in air pollution.
• No existing public transport and stations miles away.
• No proper traffic data.
• Housing density far too great.
• Over 2,000 houses will swamp and destroy Ockham conservation area, with impact on listed buildings.
• Access confined to inadequate narrow lanes.
• Water table and surface water flooding not considered either for site itself or for downstream areas on River Mole.
• Major impact on neighbouring villages, especially Horsleys.
• No assessment made of collective impact on area of this and 6 Horsley sites.
**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<th>Comment ID:</th>
<th>PSLPP16/11331</th>
<th>Respondent:</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I OBJECT TO POLICY D1 (BETTER PLACES):**

- Poor monitoring.
- No force given to vernacular or historic design guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Attached documents:**

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<tr>
<th>Comment ID:</th>
<th>PSLPP16/11333</th>
<th>Respondent:</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy D2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I OBJECT TO POLICY D2 (SUSTAINABLE DESIGN ETC):**

- Targets unachievable if Green Belt covered with amount of housing as proposed, causing traffic chaos, infrastructure failure and unacceptable levels of pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Attached documents:**

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<th>Comment ID:</th>
<th>PSLPP16/11334</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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I OBJECT TO POLICY D3 (HISTORIC ENVIRONMENT):

- Supports overdevelopment: you can’t “enhance” history. Doesn’t ban private interests from trying to make aggressive profits from privatising, commercialising and Disneyfying public historic assets.
- Doesn’t ban development near historic assets.
- Ignores NPPF 126, 131, 132, 133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11335  Respondent: 10923297 / Matthew Burnham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY D4 (DEVELOPMENT IN URBAN AREAS AND INSET VILLAGES)

- No commitment to expand social housing or accommodation for people who can’t afford so-called affordable homes.
- Not enough new homes in urban areas, despite demand and need for urban regeneration and protection of Green Belt.
- Objectives for inset villages cancelled out by plans for excessive housing growth there.
- Too much emphasis on traditional shops, when a lot of this sector is in terminal decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11319  Respondent: 10923297 / Matthew Burnham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO POLICY E1 (EMPLOYMENT):

- Poor evidence base.
- Too much encouragement to low added-value employment that’s needed elsewhere in the country.
- Fails to concentrate general business activity in urban areas or business parks that have the infrastructure.
- Fails to differentiate this from appropriate rural business.
- Too much encouragement of warehousing, for which Guildford is too congested.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11320  Respondent: 10923297 / Matthew Burnham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E3 (EMPLOYMENT CAPACITY AND FLOORSPACE):

- Puts unnecessary obstacles in the way of using brownfield land into useful residential housing, contrary to government policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11322  Respondent: 10923297 / Matthew Burnham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E4 (SURREY RESEARCH PARK):

- Subordinates public planning policy to the University of Surrey’s private, commercial enterprises (not its public academic purpose).
- No cost/benefit analysis of harm to Green Belt involved in extending research park.
- Waters down research purpose of park, turning into a general business park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT TO POLICY E5 (RURAL ECONOMY):

- Incompatible with high housing numbers proposed for rural areas elsewhere in the plan.
- Insetting and settlement boundary extension endanger appropriate rural activities listed that depend on maintaining rural areas’ character.
- Town-centre uses for rural areas contradict government’s localism policy and need to consult and protect village environments.
- Established commitments to high-speed rural broadband and mobile coverage watered down despite 2014 consultation responses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT TO POLICY E6 (LEISURE AND VISITOR EXPERIENCE):

- Danger of overdevelopment: success doesn’t depend on building “attractions” which can harm heritage and rural settings. No case made for creating new ones.
- No policy of opposing reduction in rural hotel capacity.
- No definition of what added value interventions by Council can make to normal visitor market mechanisms.
- No policy of supporting Guildford countryside as its prime leisure and visitor asset, whose value rises as London gets bigger and busier.
• No vision of what the ideal visitor experience of the borough actually is and how to support its various elements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11326  Respondent: 10923297 / Matthew Burnham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E7 (TOWN CENTRE):

• No statement in policy wording of value of Guildford’s rural setting and views.
• No consideration of Town Centre Master Plan, GVG proposals or station redevelopment plans.
• Proportion of new housing in town far too small. Development pushed into countryside, ruining the latter and harming urban regeneration.
• No brownfield register.
• Too much big retail, despite online shopping revolution and decline of traditional high streets internationally. Futile to try to turn Guildford into Woking or Kingston.
• No measures to support small, niche retailers in town, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11328  Respondent: 10923297 / Matthew Burnham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E8 (DISTRICT CENTRES):

• Too much scope to expand rural retail centres to justify major housing expansion across the countryside, despite lack of demand. Will spoil character of villages while harming Guildford’s role as a retail hub.
• No measures to support existing rural shops and services, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
### Comment ID: PSLPP16/11329  Respondent: 10923297 / Matthew Burnham  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I OBJECT TO POLICY E9 (LOCAL CENTRES):**

- No need for retail development “adjacent” to rural centres for same reason as Policy E8.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

### Comment ID: PSLPP16/11312  Respondent: 10923297 / Matthew Burnham  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I OBJECT TO POLICY H1 (HOMES FOR ALL):**

Policy doesn’t set any constraints on building.

Housing mix based on pre-Brexit growth and demographic assumptions and unreliable SHMA that wasn’t put out to formal public consultation and wasn’t scrutinised by Councillors.

Fails to compel University of Surrey to use its thousands of planning permissions and existing space, such as car parks, for student accommodation.

Lets University off the hook of accommodating all its students, so as to free up houses for the most needy in town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:


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<th>Comment ID: PSLPP16/11313</th>
<th>Respondent: 10923297 / Matthew Burnham</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</td>
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<td>I OBJECT TO POLICY H2 (AFFORDABLE HOMES):</td>
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<tr>
<td>• Using the official definition of Affordable is a joke. Affordable homes round here are not affordable! Pushing for these homes just means pushing for more development.</td>
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<tr>
<td>• The viability clause lets developers off the hook of providing even these (non-) affordable homes. Too open to manipulation.</td>
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<tr>
<td>• Contradicts government policy to develop less advantaged regions of the UK. People don’t have to live and work in Guildford but should be encouraged to move to cheaper, less congested areas.</td>
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<tr>
<td>• This policy won’t affect market forces or house prices. Guildford is too small and too near London to influence these, however many homes it builds.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT TO POLICY H3 (RURAL EXCEPTION HOMES):</td>
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<td>• It loosens the criteria by allowing “market housing” and development that changes the housing mix. Developers would be able to override NPPF “exceptional circumstances” and other restrictions to build large houses in the Green Belt.</td>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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I OBJECT TO POLICY I1 (INFRASTRUCTURE & DELIVERY)

- Infrastructure considered here as an afterthought, rather than pre-condition of development. Should be a key issue for the rest of the plan.
- Excessive housebuilding in countryside not supported by any funding or provision for infrastructure.
- Heavy focus on building on greenfield sites inefficient and unnecessary: cheap for developers but much more expensive for the public who have to fund the infrastructure.
- Draft CIL scale discourages use of brownfield land first.
- No plan for organic increase in existing traffic congestion, let alone once thousands of houses are built across the countryside. Local roads hardly considered. Green Belt being eroded before road widening/improvement plans certain, encouraging over-development of greenfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11337  Respondent: 10923297 / Matthew Burnham  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

I OBJECT TO POLICY I2 (SUPPORTING DTP'S ROAD STRATEGY):

- Doesn't allow for catastrophic increase in traffic resulting from spreading new housing estates across the borough.
- Out of sync with DTp’s strategy: houses to be built and Green Belt destroyed before plans for A3 etc implemented.
- Road plans too optimistic anyway, especially post-Brexit. Probably won’t happen.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11338  Respondent: 10923297 / Matthew Burnham  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY I3 (SUSTAINABLE TRANSPORT):

- Just a list of generic measures, not related to real life or the particularities of Guildford.
- Fails to treat sustainability as a constraint. Assumes excessive levels of development proposed in the plan can be supported by sustainable development.
- Unrealistic. Most people can’t or won’t walk or cycle – commuters in a hurry, the elderly, children, people who are unwell or unfit, people carrying heavy shopping or other goods. I.e. most residents!
- Town’s eye view of transport. Ignores scarcity of existing rural public transport and commercial unviability of increasing it. Ignores terrible state of Surrey’s roads, potholes, flooding etc. Ignores extra stress to be created by huge new housing estates in countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/11339 | Respondent: 10923297 / Matthew Burnham | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY I4 (GREEN & BLUE INFRASTRUCTURE):

- No teeth. Policy cancelled out by huge developments across the countryside. No mention of opportunity costs of loss of Green Belt services and amenities (e.g. farming).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/11315 | Respondent: 10923297 / Matthew Burnham | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO POLICY P2 (GREEN BELT):

- No declaration of support for protecting the Guildford Green Belt, contrary to NPPF and government statements.
- No evaluation of value of local Green Belt as a public and private asset: it’s just treated as potential building land with a few inconvenient restrictions.
- Impact of Green Belt development on local agriculture ignored.
- Impact on rural leisure and tourism ignored.
- Impact on flood control ignored.
- Impact on carbon sink and knock-on effects for air pollution and climate change ignored.
- Impact on biodiversity ignored.
- Impact on natural heritage ignored.
- Impact on water catchment ignored.
- Impact on room for public space amenities (parks, cemeteries, waste facilities etc) ignored.
- Impact on rural business (e.g. mineral mining, film making) ignored.
- Impact on natural landmarks and views ignored.
- Harm to public health and wellbeing (physical, psychological) ignored.
- Allows excessive levels of development in breach of views expressed in last consultation and Conservative Party manifesto commitments at the last local elections.
- Has allowed ruling Councillors to argue that there is an acceptable percentage of Green Belt that should be sacrificed to development, when no such rule exists in the NPPF.
- Ignores alternative approaches, such as fair burden-sharing under which settlements would undertake to accommodate new development in proportion to their size.
- Disproportionate amount of development (most of it, in fact) to be in Green Belt. Too few new homes in urban areas where most people (especially the young and less privileged) want to live. This will act against much needed urban regeneration.
- “Insetting” of most villages disproportionate and unjustified in terms of their contribution under the NPPF to the purposes of the Green Belt. Based on flawed Green Belt and Countryside Study. Idea that most Guildford villages do not contribute to “openness” is subjective.
- Major settlement extensions allow indiscriminate housebuilding, as irregularly shaped villages are squared off to enclose green fields.
- Overall harm to Guildford Green Belt unjustified by any objective development need post-Brexit.
- Ignores most of NPPF 17 stipulations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11340  Respondent: 10923297 / Matthew Burnham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO ALL POLICIES INVOLVING BUILDING IN THE GREEN BELT:

- No “exceptional circumstances” shown, numbers excessive and the clearly expressed views of residents in previous consultations ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11316  Respondent: 10923297 / Matthew Burnham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY P3 (COUNTRYSIDE BEYOND THE GREEN BELT):

- Gives Ash and Tongham more protection than rest of borough, including existing Green Belt. But they don’t contribute to preventing London sprawl.
- Special treatment of ward represented by current Council Leader and his predecessor. Politically biased.
- A minor extension of Green Belt in one place does not justify its major destruction elsewhere (the inset villages).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11317  Respondent: 10923297 / Matthew Burnham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY P4 (FLOOD RISK AND WATER PROTECTION):

- Limits development of urban, brownfield, hardstanding sites, pushing development unnecessarily into the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT TO POLICY P5 (THAMES BASIN HEATH S.P.A.):

- Compensation mechanism too feeble to provide protection.
- Cynical encouragement of SANG to justify nearby development in protected areas. Does not extend protection or amount of green space, and can damage them (e.g. dog and cat attacks on wildlife).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT TO POLICY S1 (SUSTAINABLE DEVELOPMENT):

- No definition given, no reference to its importance in the NPPF, no guidelines for applying it to planning.
- No statement of how economic, social and environmental impacts should be balanced.
- No mention of Green Belt, Guildford's greatest legacy by far to Sustainable Development. No commitment to protecting it.
- No reference to most of the NPPF Core Planning Principles.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Firstly I would like to say thank you to the team who visited East Horsley Village Hall to present the plan. Tough job given the size of the plan document, scale of the development and the flawed nature of the plan. I also understand that the pressure on development in a county that has such a large proportion of protected areas provides many challenges. Having said that it soon came clear that the team were not able to answer questions to an adequate level and just started repeating that you should write formally with any objections. As such this is exactly what I am doing.

I OBJECT TO POLICY S2 (BOROUGH-WIDE STRATEGY):

- Numbers based on growth and demographic data now invalidated by Brexit.
- No justification given for 13,860 housing figure. Figure based on a secret formula used by consultants and never seen by anyone on the Council or by the public. Council has failed to seek its disclosure.
- 13,860 figure confuses the OAN with a housing target. No definite housing target given, leaving too much scope for the Council to make one up. I can’t understand how we’re being consulted when we don’t know how many houses the Council want to build, taking all the contraints into account.
- Figures based on a Housing Market Area that ignores 2 neighbouring districts (Rushmoor and Mole Valley) and is much too small, since most people commute or travel far outside the Area to shop or study. This distorts the figures: no reason why Guildford needs to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 units.
- High numbers involved would transform character of the borough from mainly rural/Green Belt to urban, creating a corridor of development out of London as per Woking or Croydon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/845  **Respondent:** 10923393 / Diana Mason  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt increase tail backs on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/746  **Respondent:** 10923393 / Diana Mason  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4019</th>
<th>Respondent: 10923745 / Marwan Khalek</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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</table>

We object to Guildford Borough Council’s draft Local Plan Proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Far, which will:

- Destroy views from the Hog’s Back ridge0 a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPS16/1728</th>
<th>Respondent: 10923425 / Jeremy Belasco</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26</td>
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Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
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<th>Comment ID: PSLPA16/4017</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. The exaggerated “housing need” figure of 13,860 which is far too high. The way students, economic need and affordability are calculated inflates the housing need and this results in and leads to unnecessary development of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPS16/7488</th>
<th>Respondent: 10923745 / Marwan Khalek</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42</td>
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</table>
I am a resident of Send and I am writing to object in the strongest terms to the proposed a number of the proposed developments contained in the Local Plan. I wrote to the Council back in September 2014 in response to the then draft plan (copy attached) with some specific and general objections and concerns. Regrettably, not only has the Council failed to properly address my concerns and objections, it has issued a Local Plan that includes additional new developments that were not the subject of the prior consultation. I therefore wish to re-iterate those objections in full.

In addition, I don’t believe that the case for the effective removal of Send from the greenbelt has properly been made or factually supported by the Council. The housing needs have been grossly exaggerated, the effect of local infrastructure has been totally understated, the effect on local roads and traffic have all but been ignored and the question as to why all of this new development, to the extent it is needed, could not be accommodated using existing brownfield areas within the borough has not been properly answered.

More specifically I object to;

1. The removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>1. The building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/7487  Respondent: 10923745 / Marwan Khalek  Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The development at Garlick’s Arch for 400 houses. This has not been the subject of any prior consultation and the need is not evidenced.

The proposed industrial development of 7,000 sq m at Garlick’s Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available.

The development at Garlick’s Arch because the site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The site is also subject to flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/7486  Respondent: 10923745 / Marwan Khalek  Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. The proposed new interchange onto the A3 at Burnt Common as the traffic impact on the rest of the road network in Send has not been properly assessed and will result in traffic gridlock all through the day.
2. The proposed new interchange onto the A3 at Burnt Common. The need and effect has not been properly evidenced and the Transport Evidence provided is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7489  Respondent: 10923745 / Marwan Khalek  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7490  Respondent: 10923745 / Marwan Khalek  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16659  Respondent: 10923745 / Marwan Khalek  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. To the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16658  Respondent: 10923745 / Marwan Khalek  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. To the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3. This will severely impact the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16664  Respondent: 10923745 / Marwan Khalek  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

I trust the above provides you with sufficient information to properly consider and take into account all my objections individually and collectively and that the Council would see fit to withdraw these plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<th>Comment ID: PSLPP16/16660</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill. This will lead to the erosion of the Green Belt and is proposed without proper justification by any special circumstances.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. All proposals to build on the Green Belt at Send and elsewhere in the borough before the case is made for why such development, to the extent it is needed, cannot be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1837</th>
<th>Respondent: 10923745 / Marwan Khalek</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2140  Respondent: 10923873 / Dennis Gordon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Send being removed from the Green Belt.

The village Send provides a green buffer between Woking and Guildford. If this is not protected then all of the land in and around the village will be vulnerable to development. This would destroy the character of the village of Send. Guildford would merge with Woking through a series of urban estates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4244  Respondent: 10923873 / Dennis Gordon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the 4-way intersection.
I object to the fact the road infrastructure through Send has not been thought about and the consequences of putting a large interchange on this site would cause gridlock. The amount of traffic this will create through Send is unfeasible as there is only two way street that goes through the centre of the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4245  Respondent: 10923873 / Dennis Gordon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the development of land west of Winds ridge and Send Hill.

This site was not included in the regulation 18 Draft Local Plan so has not had full consultation. The site to my knowledge contains documented unsafe landfill waste which was registered with Guildford Borough Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/417  Respondent: 10924001 / AA Bailey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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For example, planning for a new town on the former Wisley Airfield "Three Farm Meadows" was unanimously rejected by Guildford planners and then directly put into the Local Plan. This makes the system and procedure a nonsense.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1862  Respondent: 10924001 / AA Bailey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
I write with specific concerns about the local plan. I firmly object to the inclusion of the former Wisley Airfield. Three Farm Meadows Foremost is a green belt site which was promised return to agriculture. No consideration has been taken into account of its SPA SSSI & SNCI status within the Thames basin.

The local infrastructure is at full capacity – new road configuration of narrow often flooded lanes would cause chaos to the whole area.

There are no exceptional circumstances to allow the construction of a high rise town in a rural historic village of 150 residences 2000 homes is disproportionate. Again no consideration has been taken into account for public transport already congested railway stations further heavy traffic with excessive pollution.

Guildford planners unanimously rejected this site as unsuitable.

I question the need for this number of homes in the green belt & cannot understand why brownfield sites are not built on first.

Kindly accept my objections to building in an area of natural beauty.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/893  Respondent: 10924001 / AA Bailey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write with grave concerns about the proposed eroding of the green belt. The unrealistic quantity of houses which would swamp the whole infrastructure of the community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4378  Respondent: 10924161 / Victoria French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have worked at RHS Garden Wisley for nearly 10 years, and have lived in Surrey all my life, at contrasting locations such as Croydon, Dorking and Haslemere. I have personal experience of the housing market as a Surrey resident, as do my children. I earn below the national average income and choose to live here because it is beautiful, even if it means sacrificing some life-style choices. I do not want to see this area ruined and become suburban sprawl and a biodiversity desert. I have not seen prices in the rental and buying market rise very much at all over the last five years - indeed I believe they have just fallen following the brexit vote. The devaluing of the pound has suddenly made us an even more attractive market for foreign investment: this is trend does not support the apparent housing problem. We've yet to see the effects of the buy-to-let changes. The Green Belt is as necessary here as the parks are to London. I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp17q/195  Respondent: 10924161 / Victoria French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A42 change at Clockbarn in Tannery Lane to a 33% increase in housing development because it will impact on the Green Belt. It will increase traffic congestion and pollution and adversely impact surface water run-off.

I object to the Policy A43 change at Garlick's Arch of 400 homes and 6 Travelling showpeople plots which represents an inappropriately large development which will change the character of the village and join up Ripley and Send. The amenity of permanent Green Belt will be degraded, replaced with more traffic congestion, air pollution and potential increased river water pollution from run-off - the site is currently a flood zone 2.

I object to Policy A58 at Burnt Common to build industrial warehousing on the Green Belt for all the reasons stated above and specifically when there are empty units on existing industrial sites in Guildford and Slyfield.

I object to the proposal to inseet Send Business Park from the Green Belt because there is highly restricted traffic access along Tannery Lane and an increase in this would degrade the Green Belt and the countryside along the Wey Navigation.
The value of open countryside in terms of access and views for physical and mental health has never been better documented, and yet it is constantly under attack from developers and insufficiently protected by local government, causing untold stress to local residents and the threat of the loss of amenity to visitors from far and wide, specifically from the urban and suburban conurbations. This, despite years of objections by, collectively, thousands of people in this area.

The assumption that this area is up for grabs, together with the unbelievably wasteful proposal to expand the A3, will forever degrade this area of Surrey and send a signal that the Green Belt has no value other than financial, and that for a very limited range of business interests. I urge the Council to protect our environment and support a sustainable model for all the people and biodiversity that depend on the protection of this landscape.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2918  Respondent: 10924225 / Anne Sparkes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal in the local plan on the grounds that the site is not large enough to the proposed use.

I object to the proposal in the local plan on the grounds that it would cause adverse impact on street parking.

I object to the proposal in the local plan on the grounds that Send Hill is a single track country road and too narrow to provide sufficient access to the site or accommodate the potential new levels of traffic the proposed development would bring.

I object to the proposal in the local plan on the grounds that send is in green belt. The proposed inset is inappropriate due to its permanent green belt status.

I object to the proposal in the local plan on the grounds that Send Hill is a narrow road result in loss of a turning point for vehicles.

I object to the proposal in the local plan on the grounds that it would impact the nature reserve nearby. The proposed site is a quality green belt amenity area within countryside and would be spoilt by development.

I object to the proposal in the local plan on the grounds that the existing road and parking infrastructure is already inadequate or under pressure and could worsen with the planned development, reducing quality of life.

I object to the proposal in the local plan on the grounds that too many houses are proposed to Send/Send Marsh are and the impact on traffic congestion and local services would be unacceptable.

I object to the proposal in the local plan on the grounds that the proposed number of houses potentially could result in 92 extra cars in Send Hill which is already suffering from congestion particularly at school run time.

I object to the proposal in the local plan on the grounds that this would cause loss of village identity, be detrimental to the community and increased flood risk.
I object to the proposal in the local plan on the grounds that a Wasteland Solutions environmental report on Send Hill dated March 2004 gave evidence of past ponding of water in the excavated area. Further development would disturb water table and increase risk of flooding to my property.

I object to the proposal in the local plan on the grounds that the proposed development site (A44) was used as GBC registered landfill site, not a quarry as listed as reference LLA 2081 in the local plan.

I object to the proposal in the local plan on the grounds that the 1963-8 Ordnance Survey maps of proposed site mark it as "refuse and sag heap". It is therefore unsuitable for such a development on health reasons. I object to the proposal in the local plan on the grounds that the 1971 Ordnance Survey maps of proposed site mark it as "refuse tip" prior to when proper licensing/registration was required. The date of the landfill works predates the 1999 EU landfill Directive regulations. I therefore believe that there is a danger that any disturbance would be health hazard due to the unknown materials.

GBC has installed gas monitoring wells on site since July 2000. One well recording methane gas discharge.

I object to the proposal in the local plan on the grounds that a Southern County Searches (Sitescope Ltd) report E.2978.SN-HCP dated 5 January 2005 identifies the proposed site as GBC recorded landfill site Ref GU/11/LLC with type of waste not identified. The date of the landfill works predates the 1999 EU Landfill Directive regulations. I therefore believe that there is a danger that any disturbance would be health hazard due to the unknown materials.

I object to the proposal in the local plan on the grounds that a Southern County Searches (Sitescope Ltd) report E.2978.SN-HCP dated 5th January 2005 identifies proposed site GBC recorded landfill site Ref GU/12 with type of waste identified as "unrestricted2. This causes me concern as to what it does contain and dangers if disturbed.

I object to the proposal in the local plan on the grounds that both Envirosearch Report RS1001201-1-1 dated 17th February 2004 and historical map data and information from GBC has identified site as landfill and has "areas of potentially contaminative industrial activities". Development of this site would be a health hazard. The recent news reports of a child dying from seepage of contaminated ground following flooding prove that developing any such sites is a danger to health. The Daily Mail has also recently had an article on how dangers of living near landfill site raises cancer concerns. The paper referenced a study published by the international journal of Epidemiology which tracked 242,000 people living near landfill sites in Italy.

I object to the proposal in the local plan on the grounds that both Envirosearch Report RS11001-1-1 dated 17th February 2004 identifies "potential risk from landfill gas migrations" which I believe is a health hazard.

I object to the proposal in the local plan on the grounds that both Envirosearch Report RS1100201-1-1 dated 17th February 2004 Concludes "potentially contaminative industrial sites identified from analysis" of Ordnance survey maps.

I object to the proposal in the local plan on the grounds that the Southern County Searches (Sitescope Ltd) report E.2978.SN-HCP dated 5 January 2005 identifies proposed site as a local authorised landfill site as licences under Part 11 of Environmental protection Act 1990. The proposed site is not a quarry as specified in.

The GBC Local Plan. Therefore not suitable for the proposed usage.

I object to the proposal in the local plan on the grounds that the Southern County Searches (Sitescope Ltd) report E.2978.SN-HCP dated 5th January 2005 identifies proposed site as potentially contaminative industrial land. With usage of "Heap and unknown constituents". This causes me concern as to what it does contain and dangers if disturbed.

I object to the proposal in the local plan on the grounds that the Southern County Searches (Sitescope Ltd) report E.2978.SN-HCP 5th January 2005 Identifies changes to proposed site could cause potential ground water vulnerability to my property.

I object to the proposal in the local plan on the grounds that the Traveller Accommodation Assessment research, purported to have been undertaken in June-July 2012 by Mill Field Services, cannot be so. The Sittingbourne based market research company was dissolved in January 2011 according to the government companies site.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:  pslp172/1797  Respondent: 10924257 / Catherine Anderson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:  PSLPS16/4458  Respondent: 10924321 / Tristan Caviet  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings
I object to the draft Local Plan for the following primary reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.
Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<td>I object to the number of 693 new houses per year in the borough because it is far too high. The number is based on the model in the SHMA report, which the Council will not publish and so cannot be challenged. Approximately half of the number in the model is thought to be an increase in the number of students at the University. GBC should not be building accommodation on behalf of this business.</td>
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<td>I object to the inclusion of the site at Wisley Airfield (known as Three Farm Meadows) because the planning application has already been rejected by GBC’s Planning Committee for very good reasons.</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development of the site at Garlick’s Arch which is at risk of flooding. The Plan does not take into proper account the risk of flood risk, as required by National Planning Policy. This area has flooded several times in recent years.

I object to the damage to the environment as a result of the massive scale of the proposed developments. One example, the Garlick’s Arch proposal, would double the size of the local built-up area, and would destroy the ancient woodland on the site, which includes many ancient oak trees.

I object to the employment strategy and impact at Garlick’s Arch because there is no need for a new industrial site there when there is an existing brownfield industrial site at Burnt Common which could be used instead. A new development on the site would result in the loss of existing businesses, which employ local people and have been for there a long time.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13131  Respondent: 10924609 / H Perryman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that the proposed plan does not meet the requirements of local communities. Neighbourhood Plans have not been taken into account. The semi-rural aspect, clean air and country lanes are important to local residents and most want to retain them. Ripley has already accommodated more than a 10% increase in housing in the last few years and it will only take a little more to change its character dramatically. Thousands of new houses are proposed in the immediate vicinity, plus more over the northern border of the borough in Woking. This will mean congested roads and the destruction of the rural aspect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13128  Respondent: 10924609 / H Perryman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object because of concern about poor air quality. The massive developments being proposed in the north east of the borough will lead to worse road congestion and therefore to higher levels of air pollution.

I object to the population density of the proposed developments, which are often higher than most city boroughs. This is not a sensible way to treat the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposals to remove the villages of Ripley, Send and Clandon and the site of Send Prison from the Green Belt. Also the sites of Wisley Airfield and Garlick’s Arch. National Planning Policy requires exceptional circumstances for the Green Belt boundaries to be changed or for the development within Green Belt. There are no exceptional circumstances for these villages and the land to be removed from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13129  Respondent: 10924609 / H Perryman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the borough-wide strategy of the Local Plan because it is poorly considered. The strategy calls for nearly 14,000 houses across the borough of which a completely disproportionate number (more than a third) will be in the rural wards of Lovelace, Send and Clandon and Horsley. This will have a permanent detrimental effect on all the communities in these wards. The existing small communities will be merged into an urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4015  Respondent: 10924609 / H Perryman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
• I object to the continued inclusion of Three Farm Meadows at Wisley despite it being rejected by the council’s Planning Committee.
• I object to the changes made to the plans for Three Farm Meadows as they still do not address the problem of the lack of infrastructure and local services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2105  Respondent: 10924609 / H Perryman  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I object to the amended number of new houses per year as it is still based on the model in the SHMA report, which the Council will not publish and so cannot be challenged.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2104  Respondent: 10924609 / H Perryman  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I object to the continued plan to remove Ripley, and other villages, from the Green Belt. The change to the green belt boundary at Ripley is not sufficient to make it reasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/507  Respondent: 10924641 / Ben Yates  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- It is effectively an old non-confirming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation.
- There is highly restricted vehicular access along Tannery Lane in both directions.
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3804  Respondent: 10924641 / Ben Yates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- The increase to 60 homes in place of 45 homes is 33% more and too much
- It ignores all the hundreds of previous objections made by local people
- It will worsen access and traffic problems in Tannery Lane and at the A247 junction.
- It will make erosion of the Green Belt in our village worse.
- It will make surface water flooding, which is already bad, even worse.
- It will impact open countryside views from the River Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3806  Respondent: 10924641 / Ben Yates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
• It was deleted from the 2014 draft because of all the objections made previously.
• The word ‘minimum’ is a change from the previous ‘maximum’ in the 2016 plan and since that time there has been a decline in demand for industrial land.
• There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
• The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt.
• The impact on small surrounding roads will create traffic gridlock.
• It will join up existing villages and defeat the purpose of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1851  Respondent: 10924769 / Christy Dadswell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3687  Respondent: 10924769 / Christy Dadswell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to Policy A25 Gosden Hill as being totally an inappropriate and unsustainable development of 2000 homes in the Green Belt which will cause coalescence and urban sprawl from Burpham to West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3678  Respondent: 10924769 / Christy Dadswell  Agent:
<table>
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<tr>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT to the inclusion of strategic site Policy A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local. This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
1. I OBJECT to policy A43a proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3651  Respondent: 10924769 / Christy Dadswell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3639  Respondent: 10924769 / Christy Dadswell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7910  Respondent: 10924769 / Christy Dadswell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I OBJECT to all in setting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>1. I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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1. I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/7852  **Respondent:** 10924769 / Christy Dadswell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT to the Guildford Borough Proposed Submission Local Plan (June 2016) as this plan is unsound, unsustainable, unworkable, flawed and in many instances, unnecessary for the reasons set out below.

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/1449  **Respondent:** 10924833 / Caroline Mankelow  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/819  **Respondent:** 10924897 / Louis Botha  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

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**Site A25 – Gosden Hill:**

I object to the proposed development of 2000 houses at Gosden Hill as it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

I object to the fact that this site was not included in the Regulation 18 draft and has not been consulted upon previously. Full consultation is required.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPS16/820</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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**Site A35 – Wisley**

I object to the large proposed development of 2000 houses at Wisley Airfield as it will destroy large areas of Green Belt and agricultural land and produce massive congestion on the A3 and surrounding roads including Ripley and Send.

To conclude: the draft Local Plan represents a terrible sentence for our villages. We are destined to become a victim of urban sprawl based on an exaggerated housing need. NPPF states that the Green Belt should only be altered in “exceptional circumstances.” There manifestly are no exceptional circumstances in Send.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Site A42 – Clockbarn:

I object to building 45 houses at Clockbarn. The available road infrastructure simply cannot support it. Tannery Lane is far too narrow to take any substantial traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic.

I object to the fact that this site was not included in the Regulation 18 draft and has not been consulted upon previously. Full consultation is required.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A43 – Garlick’s Arch:

I object to the proposed industrial site at Garlick’s Arch. There is no need for such a site. The Employment Land Needs Assessment 2015 shows a reduction in required employment floor space from the previous draft plan. If the Council truly believes there is a need for such a large amount of industrial space it should be located at the current Slyfield site.

I object to the development of the 400 houses at Galick’s Arch. It was included in the Local Plan at the last possible moment, with no prior local consultation. It is not required in terms of housing need either for the village or the borough.

I also object to the development of the 400 houses at Galick’s Arch on the basis that the site is liable to severe flooding. The ancient woodland is a particularly sensitive area that must not be disrupted in any way.

I object to the fact that this site was not included in the Regulation 18 draft and has not been consulted upon previously. Full consultation is required.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Site A43A and A43B – Burnt Common interchange:

I object to the proposed interchange onto the A3 at Burnt Common. The interchange will cause the A247 to become a through-road between Woking and the M25. Send is building a new primary school on that particular stretch of the A247. Creating the new interchange, together with the additional school traffic, will cause immediate and virtually permanent gridlock on the A247, which would severely damage village life.

I object to the fact that this site was not included in the Regulation 18 draft and has not been consulted upon previously. Full consultation is required.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/821  Respondent: 10924897 / Louis Botha  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A44 - Send Hill:

I object to the development of 40 houses at Send Hill. It consists of particularly high quality Green Belt within an area of particularly beautiful countryside which would be destroyed by this development. The subsoil of the existing site contains documented unsafe landfill waste which is currently vented. The proposal for 2 travelers’ pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

I object to the fact that this site was not included in the Regulation 18 draft and has not been consulted upon previously. Full consultation is required.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1668  Respondent: 10924897 / Louis Botha  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy I1:

I object to the failure of the Council to identify sufficient brownfield sites within the Guildford urban area, which must be targeted first for development before countryside and the Green Belt. I also object to the failure of the Council to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1667  Respondent: 10924897 / Louis Botha  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P2:

I object in the strongest possible terms to the removal of Send from Green Belt status and to the proposals to build on the Green Belt fields at Gosden Hill, Garlick’s Arch, Send Hill and Clock barn Nurseries, particularly Sites A25, A35, A42, A44 and A43. NPPF states that the Green Belt should only be altered in “exceptional circumstances.” There simply are no eligible exceptional circumstances expressed in the Local Plan or supporting documents. Guildford’s urban brownfield areas must be identified and utilised instead, not only to protect our countryside but also to limit the impact on road traffic yet provide much-needed access for new housing to transport links such as the rail network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1669  Respondent: 10924897 / Louis Botha  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S2:

I object to the exaggerated housing need figure in the West Surrey Strategic Housing Market Assessment on which the Draft Local Plan is based. The Council has declined to provide any objective evidence to substantiate the projected housing numbers, which in my view is far in excess of reality. In particular I believe the calculation of foreign students has been wrongly used to inflate the housing need.
Furthermore, the housing number is based on pre-Brexit projections for economic and population growth, including migration. These now need to be revised downwards.

I object to the fact that the impact on infrastructure has not been considered sufficiently. Current infrastructure is utterly inadequate to deal with proposed new housing levels. Roads, doctors and schools will be unable to cope. Yet no tangible resolution has been proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please find below my objections to the revised draft Guildford Borough Local Plan currently open to consultation.

To start with, I object to the approach to consultation that the Council is taking. The Council withdrew the 2014 draft Local Plan following an outcry from residents. During its re-drafting, instead of arriving at a sensible alternative the Council has changed every major site in Send and added a massive new road junction. It beggars belief that the Council could on one hand state that they listened to residents, whilst on the other hand increase the planned housing levels in the village. Either way, the proposed changes are significant and therefore require another full consultation under Regulation 18, not the short-cut of Regulation 19 which the Council is using.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the lack of provision to improve the current infrastructure which is currently inadequate.
2. I object to the lack of additional parking provisions in the villages – again which are currently inadequate.
3. I object to the 4 way junction to the A3 which will force more traffic through the already overloaded roads, which incidentally are in a very poor state of repair.
1. I object to the Garlick’s Arch development as it does not provide for sufficient Utilities capacity which is currently almost at capacity.
2. I object to the designated 400 houses at Garlick’s Arch as this is in addition to the 13,000 odd already proposed for the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. I object to local villages (Send, Ripley, Clandon, Wisley) being removed from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. I object to large developments in one area – ie at least 400 homes at Garlick’s Copse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. I object to further large developments due to the greater levels of air pollution that will result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Policy A43

I object to the above Policy change at Garlick’s Arch which is now 400 homes and 6 travelling show people plots.

Why do the previous thousands of objections appear to be ignored by the Council?

This land is green belt – the Government itself states the following:-

Green Belt serves five purposes:
• to check the unrestricted sprawl of large built-up areas
• to prevent neighbouring towns merging into one another – Send and Ripley will become one if these homes are allowed to be built.
• to assist in safeguarding the countryside from encroachment
• to preserve the setting and special character of historic towns
• to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

So as there are no exceptional circumstances why are these being ignored in respect of Garlick’s Arch that has been around for hundreds of years.

I have lived in Send Marsh for 21 years and in all that time there has never been a proven demand for Travelling show people spaces.

Already at peak times it is very difficult to get out of Send Marsh Road onto the old A3 and these homes will only generate additional traffic – additionally if there is a problem on the main A3 all the traffic filters down through the old A3.

I do not believe that sufficient thought has been given to the infrastructure of the whole area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to building 400 houses and 7,000 sqm of industrial space at garlics arch opposite send marsh road. the site floods constantly and is covered by ancient woodland, the industrial space is not needed but if it were it should be at slyfield;. Guildford housing requirements have been shown to be grossly exaggerated and they have not refused to disclose their calculations. with proper use of brownfield site, this greenbelt site is not needed!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3368  Respondent: 10925217 / AW Winterborne  Agent:

I object to a new interchange with the A3 at burnt common because send would have to take the traffic load from the a3/ m25 woking and guildford, pollutant levels are already exceeding the limit with the current load but having more would just make the area toxic

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3367  Respondent: 10925217 / AW Winterborne  Agent:
I object to the development of 40 houses and 2 travellers pitches at send hill…

Inappropriate location because of the narrow width single access country road provides insufficient access. The subsoil of the site contains unsafe toxic landfill.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7457  Respondent: 10925217 / AW Winterborne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to my village that I’ve lived on for decades being removed from the greenbelt, and I’ve heard countless number of times that it would “be protected” and “intended to be permanent” also many politicians/local government have “promised?” to protect the greenbelt, also there’s a “law” that protects the greenbelt like the grade 1-3 listing for old buildings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3356  Respondent: 10925409 / Tina Higgins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Local Plan in no way considers the infrastructure required to support that Plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3355  Respondent: 10925409 / Tina Higgins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

955
The use of a “Black Box” method which has been used by GBC to derive the housing target is fundamentally flawed. At a recent meeting the leader of the Council was unable or unwilling to shed any light upon the methodology or parameters used within the model. The annual number of new homes required quoted in the draft Local Plan exceeds the needs of residents.

- The Local Plan has not factored in a reduction of student numbers as a consequence of Brexit
- nor does it factor in the housing stock released due to students, currently renting from private landlords, no longer taking out leases from the private sector due to falling student numbers and additional direct University Housing Capabilities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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The Local Plan which does not maximise the use of existing brownfield sites – these should be regenerated and used for housing – in particular the Social Housing which this flawed model does not correctly address. The Brownfield site at Burnt Common should be used for new housing needs and not the greenbelt site at Garlick’s Arch

- The Local Plan does not consider flooding risks (Garlick’s Arch),
- seeks to decimate ancient woodland (Garlick’s Arch),
- does not consider the impact upon wildlife (Garlick’s Arch),

and seeks to include industrial usage on a greenbelt site (Garlick’s Arch) rather than using a Brownfield site (Burnt Common)

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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The creation of ramps to and from the A3 at Garlick’s Arch / Burnt Common (A43A) would exacerbate local traffic problems on roads which already cannot support the existing volume of traffic. The new ramps would generate significant additional flows upon local roads creating numerous rat runs as commuters strive to save additional time. This pressure would not just be felt by the A247 but by narrow lanes e.g. those around East Clandon and Tithebarns Lane in Send.

- The Local Plan seeks to direct additional traffic onto roads (A247) which cannot be widened to accommodate the additional volume of traffic
- The creation of the ramps to and from the A3 at Garlick’s Arch / Burnt Common would generate additional noise to Local houses whilst significantly deteriorating the quality of air
- These ramps would generate significant safety risks to those living in the immediate vicinity of the planned ramps (Tithebarns Lane) together with pedestrians, cyclists and other users of Tithebarns Lane – including staff and visitors to HMP Send.
- The Local Plan which includes 400 houses and 7,000 sq feet of industrial usage (A43) in an area where only recently you correctly turned down an application for only 25 houses. Housing Need is not an exceptional circumstance which justifies the removal of land from the Green Belt. Simply because a Landowner and a Developer are seeking to make millions of pounds profit – that greed is not an exceptional circumstance which justifies the removal of land from the Green Belt. Neither is there an exception circumstance justified when those said Land owners and developers effectively offer a bribe of paying for the ramps to the A3 (A43A). On every moral and ethical test this is not something which can be justified and should be removed from the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I was for many years a Chair of Governors in both the Primary and Secondary sectors. An issue that engaged much of my
time and energy was the selling off of school playing fields; the main thrust of my opposition to such short-sighted action
was that once a playing field has been swallowed up by development it can never reclaim its status quo. The proposed
Local Plan could amount to the same situation, but on a much larger and potentially more dangerous scale; once Green Belt
is gone it is GONE – FOREVER. We neither want nor indeed need an urban sprawl from Guildford up to the M25 which
the ‘Vision’ would create. We have areas designated as Green Belt for excellent reasons – the clue is in the name.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

| Comment ID: SQLP16/1612 | Respondent: 10925409 / Tina Higgins | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments? |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

The Plan has been generated in conjunction with developers who are seeking to line their pockets with no regard for the
historic planning restrictions which have served the Community so well for so many years

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

| Comment ID: SQLP16/1613 | Respondent: 10925409 / Tina Higgins |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments? |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
I very much hope that common sense and moral decency will, in the end, prevail and that in the light now being shone on an extremely flawed plan that you consider the real needs of those affected and not just of those who will benefit (in no small way) financially.

Do you really want to be held responsible for depriving future generations of our valuable Green Belt?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp172/2618  **Respondent:** 10925409 / Tina Higgins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A42 change at Clockbarn in Tannery Lane because:

- The increase to 60 homes in place of 45 homes is **33% more** and too much
- It ignores the **innumerable previous objections** made by local people
- It will worsen access and traffic problems in Tannery Lane and at the A247 junction
- It will make erosion of the Green Belt in the village worse
- It will make surface water flooding, which is already bad, even worse
- It will impact open countryside views from the River Wey Navigation

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp172/2619  **Respondent:** 10925409 / Tina Higgins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43 change at Garlick's Arch because:

- It ignores all the **many previous objections** made by local people
- There is no proven demand for Travelling Showpeople plots in this location
- It is beautiful permanent Green Belt and no "exceptional circumstances" exist
- It will cause over-development of the village and the number of homes is excessive
- It is exquisite ancient woodland that existed at the time of Elizabeth I
It will join up Ripley and Send and defeat the key purpose of Green Belt
It is subject to frequent flooding and is currently a flood zone 2 allocation
It is contaminated by lead shot accumulated over fifty years
It will generate excessive traffic that will block up the local roads of Send and Ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2620  Respondent: 10925409 / Tina Higgins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A 58 at Burnt Common because:

• It was deleted from the 2014 draft because of all the objections made previously
• The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land
• There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
• The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt.
• The impact on small surrounding roads will create traffic gridlock
• It will join up existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1051  Respondent: 10925409 / Tina Higgins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposal to inset Send Business Park from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

I trust that all of these objections, together with those which I submitted when the previous iteration of this Local Plan was made open to comment, will be taken into account when finalising the Local Plan. That final version should simply address the real needs of the community and not merely reflect the desires of developers and land owners.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1921  
Respondent: 10925729 / Diana Johnson-Hill  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3819  
Respondent: 10925729 / Diana Johnson-Hill  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCl).

I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I object to the fact that the crime rate will increase and my safety compromised.

I object that the already overstretched NHS resources will not be able to cope with all these extra people.

I object to paying a very high Council tax to live in a rural pleasant environment which will now prove to be poor value for money.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8111  Respondent: 10925729 / Diana Johnson-Hill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8112  Respondent: 10925729 / Diana Johnson-Hill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1967  Respondent: 10926017 / Phlippa Holmes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My husband and I have lived at the above address since 1987, our two children have attended the Raleigh primary and Howard of Effingham secondary schools, we are both busy in village activities and I am now in receipt of a pension after 15 years as a teaching assistant at the Raleigh School.

Suffice to say I am appalled at the Guildford Borough Proposed Submission Local Plan: strategy and sites: June 2016 which proposes a new site for 90 homes opposite Greta Bank which is in addition to the 385 previously proposed in the Horsleys. Accordingly, I would like to raise my objections to this large expansion in village population, particularly in West Horsley, on the following grounds:

1. Both local state primary and secondary schools are at capacity with no guarantee that children living in West Horsley will be able to attend in the future. Extra stress on these high performing schools from additional numbers without increased resources and extra facilities will lower standards. In addition, the transport of young children to other schools in other places will diminish the quality of the children's educational experience and add to existing road traffic problems.

2. The Horsley Medical Centre already has difficulties in providing early appointments with doctors for patients with medical issues so additional villagers, both young and old, would make the situation The alternative of attending the A&E Department at the Royal Surrey County Hospital only transfers the problem elsewhere on an already over-stretched NHS.

3. The Street and East Lane are already congested with early morning road traffic due to on-street parking, a single lane chicane and numerous school There is thus the serious risk of injury to schoolchildren and cyclists from increased traffic at a time when drivers can be tempted to rush to their early morning destinations.

4. Flooding on The Street and East Lane is already a problem after heavy rai The loss of natural drainage with land use change and additional household waste water will aggravate this problem.

1. The inhabitants of West Horsley currently enjoy "green" areas and a relatively tranquil environment which make important contributions to their quality of life. Both would be diminished by the proposed development. In particular, the loss of the green space to the south between The Rectory and the railway bridge and to the north between Long Reach and the railway bridge should be strongly resisted because, unlike other proposed sites in the Horsleys, these fields do not abut the currently defined village settlement on any side so should not be considered an "extension of the settlement or 'infill'".

It is disappointing that, despite a recent survey in which almost all respondents agreed that "West Horsley should retain the open aspect and strategic natural space along East Lane, The Street, Ripley Lane, Epson Road and Long Reach, which reinforce the village's rural nature", and several representations to GBC Planning department, the GBC not only persists but has actually enlarged the area of land proposed for new housing in the village.

This letter is a plea to respect our wishes for significant revision to this latest proposal. No boundaries should constrain the argument, even to the extent of having the GBC challenge the basic need for adversely affecting the historical character of West Horsley and other Surrey villages with the Government. Why are there not proposed restrictions on ownership of second homes to release additional housing from the current stock? Why are brownfield sites not being effectively developed first? Why, at the national and regional levels, is there not an effective policy for some control of immigration and the population in small local areas? Addressing such questions would help to reassure the villagers of West Horsley that, whatever the proposal, there would at least be a sound basis for accepting some adverse effects on our quality of life. At present there is none. The proposed Plan should be withdrawn.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Since Brexit, forecasts of increasing population numbers have been reduced. The ONS forecast is now only forecasting 10.4% for Guildford, which still intends to increase its housing stock by 22%. This doesn't seem to make sense?</td>
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<td>57% of new housing proposed is on land that is currently categorised as Greenbelt and this is, quite frankly, shameful as this land was supposed to be protected for future generations</td>
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I object to Guildford Borough Council's Proposed removal of the Former Wisley Airfield/ Three Farm Meadows former Green Belt status.

The Government advice states 'The Green Belt should only be altered in exceptional circumstances through the local plan process and the support of the local people. Demand for housing alone will not change the Green Belt.' The inclusion flies in the face of this edict.

The proposed plan does not have the above support or meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are:

- access to the countryside and clean air and
- the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the Former Wisley Airfield/Three Farm Meadows.

I object to:

- the removal of the Former Wisley Airfield from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- the disproportionate allocation of housing in this particular part of the borough. Over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to Three Farm Meadows, an area that at present has only 0.3% of the population of GBC).
- the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment as far too high. This assessment and calculation process has been far from transparent and is more than double the figure used in previous plans.
- over 70% of new housing being built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate, as above, are being ignored.

Insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the former Wisley Airfield (FWAj, now known as Three Farm Meadows (TFM). Allocation A35- for the phased development of a new settlement of up to 2100 dwellings

I object to local plan which still includes the above site at the Former Wisley Airfield/Three Farms Meadows. Despite overwhelming objections from the public and the application being unanimously rejected by GBC, this site remains on the local plan.

The Government advice states 'The Green Belt should only be altered in exceptional circumstances through the local plan process and the support of the local people. Demand for housing alone will not change the Green Belt.' The inclusion flies in the face of this edict.

The proposed plan does not have the above support or meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are:

- access to the countryside and clean air and
- the peace and quiet afforded by wide open Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the Three Farm Meadows.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/1549</th>
<th>Respondent: 10927137 / Mary Pargeter</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

TRAFFIC AND HIGHWAYS

From the severe alterations required to the road network it is obvious that the size of this development is inappropriate for the location.

- the re-routing and one way systems would entail long detours to reach nearby locations and extra traffic (estimated 4,000 cars) would increase noise and This is a unreasonable imposition upon existing residents and obviously affects Ripley, Horsley and Cobham and all of their adjoining minor and major highways.
- Southbound traffic to the A3 would be forced through Ripley High Street, already heavily congested at Newark Lane in the rush Traffic joining the A3 from Old Lane, a dangerous junction with fast traffic joining the A3 from the sliproad, would back up.
- Junction 10 on the M25 is already heavily backed up at peak times and the pollution levels already exceed the European safety standard.
- The lack of suitable public transprt. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.
- the assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
- the danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3407  Respondent: 10927137 / Mary Pargeter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

INFRASTRUCTURE

• Sewer flooding at Bridge End, Ockham Lane continues to occur. Thames Water and the Environment Agency and GBC have been made aware of this since Nothing has been resolved and the surcharging manholes continue.
• Ripley treatment works is over capacity and the sewer network is in There is not the capacity to add any further development at all. It is already overloaded and cannot cope as it stands.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3408  Respondent: 10927137 / Mary Pargeter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The development is out of scale and proportion with this rural and agricultural environment and would impact greatly on the character of the local hamlets of Ockham and Hatchford.

The Local Plan poses a threat to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

The proposed plan does not have the support the local community and is in opposition to Government advice that the local plan should have that support and that demand for housing alone will not change the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**GREENBELT**

I object to:

- over 70% of new housing being built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- the removal of the Former Wisley Airfield from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment as far too. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- the disproportionate allocation of housing in this particular part of the borough. Over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to Three Farm Meadows, an area that at present has only 0.3% of the population of GBC).

Insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
I object to the inclusion of Three Farms Meadows in the draft Local Plan. This application was turned down unanimously at the planning committee meeting. Thousands of letters of objection were received. However this has all been ignored by the Council by refusing to remove this development, which appears to have been added as a direct copy from developer's layout of the site. I have written to object several times and wish that those comments are passed on to the inspector.

In summary:

• green belt infringement or removal.
• adjacent to already heavily congested road system of M25 and A3 junction.
• pollution levels already exceeded.
• increase of estimated 4,000 cars narrow country lanes unable to cape, car parks.
• already full at railway stations.
• closure and rerouting of neighbouring lanes.
• Infrastructure of sewer system unable to cope with existing demands - surcharging already occurs.
• ruination of historic village of Ockham.
• out of scale and proportion to this rural location.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8193  Respondent: 10927201 / David Pinder  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It appears to me that the stated policy regarding housing mix and density is inconsistent with the actual proposals. The proposed development of 485 homes on 5 sites in West Horsley (A37/38/39/40/41) is at a considerably higher density than we have currently in the village. If we are to have some development in West Horsley the proposals should be in line with the policy, i.e. housing density should consider "the local area context and character and the sustainability of the location". I object on the grounds that the current proposals would be out of character with the existing mix of different housing styles and layout of the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/8196  Respondent: 10927201 / David Pinder  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy I1: Infrastructure and delivery

I would like to object to the proposed developments as in my view they are unsustainable. The facilities in West Horsley are already very limited, we have one convenience store, one newsagent and a garage/MOT centre. In terms of public transport there is a very limited bus service that runs on weekdays only so for most people their needs are met by driving to East Horsley or elsewhere. We have one primary school, The Raleigh School, which is full every year meaning some local parents have to take their children further afield. Clearly West Horsley does not have the facilities to accommodate high volumes of new housing development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8198  Respondent: 10927201 / David Pinder  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy I3: Sustainable transport for new developments

I have not seen any proposals for new or improved transport infrastructure as a result of these developments. The obvious conclusion is that there will be a huge increase in motor traffic on village roads as a result of the new developments. As a motorist this will lead to a significant increase in journey times and no doubt the problems we already have with potholes will only get worse. As a cyclist (I cycle to and from Horsley station most days) I worry about the impacts on road safety given our roads are generally quite narrow and poorly lit. As a resident I worry about increased noise and air pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8194  Respondent: 10927201 / David Pinder  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P2: Green Belt

I object to the proposal to remove West Horsley from the Green Belt. I don't see that any sound case has been made to justify changing the boundaries of the Green Belt. I have read the guidance in the National Planning Policy Framework which makes it clear that Green Belt boundaries should only be altered in exceptional circumstances and that unmet housing need alone is unlikely to qualify as "exceptional circumstances".

Apart from the obvious benefits that the Green Belt designation provides, e.g. protection of our natural environment and good air quality, there are wider social benefits. Without the protection offered by the Green Belt the character of our village would be changed, which will over time lead to a loss of community and could result in West Horsley transforming into another bland commuter town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5832  Respondent: 10927553 / Marion Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to 45 houses proposed for Clockbarn Nursery. The centre of Send is already very busy with traffic and the crossroads is dangerous enough at present without adding yet more traffic. Tannery Lane is scheduled to carry additional traffic from the development of the Marina and the Tannery, yet more from Clockbarn nursery would cause gridlock and the potential for accidents and injury would be massively increased.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5831  Respondent: 10927553 / Marion Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposed houses and industrial space at Garlick's Arch. 400 houses is far too high a number to inflict on the village of Send and 7,000 sq m of industrial space would be adding insult to injury. This is valuable farmland which happens to flood from time to time. Much of the space is an ancient woodland. Too many trees have been felled over recent years, which has resulted in the loss of habitat for birds and wild animals. The loss of farmland would adversely affect the bee population on which the crops depend in order to feed the many people who now live in UK. The additional traffic would further clog up the roads which are already overloaded. This is a totally unsuitable site for industry, what is wrong with expanding Slyfield, where there is existing industrial usage?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

**Comment ID:** PSLPS16/5830  **Respondent:** 10927553 / Marion Harris  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed new interchange on the A3 at Burntcommon. The local roads already have queues on a frequent basis and cannot hope to cope with the additional traffic such an interchange would generate.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

**Comment ID:** PSLPS16/5833  **Respondent:** 10927553 / Marion Harris  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed building of 40 more houses and 2 travellers pitches at Send Hill. The road is extremely narrow and quite unsuitable for such a development. I understand this was a former landfill site and is therefore unsuitable for housing development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

**Comment ID:** PSLPP16/11860  **Respondent:** 10927553 / Marion Harris  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

When the Wimpey estate was built it adversely affected the local school, the doctors surgery and the whole ambience of the village. Has anyone considered enlarging the school and building a larger surgery to cope with the hundreds of extra people? This is quite apart from the roads and the bus services. Would a train service take the strain off the roads? Where is the nearest useful station, can the railway be extended? It is much simpler to put the housing on brownfield sites in the towns before even thinking about despoiling the green and pleasant countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/11859</th>
<th>Respondent: 10927553 / Marion Harris</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Send being removed from the Green Belt, which is meant to save the countryside from being over-run by the nearby towns of Guildford and Woking. Central Government and Local Councillors should honour their promises and not renege on them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 10927553 / Marion Harris</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the POLICY A42 changes in respect of Clockbarn Nursery, Tannery Lane, Send, where it is now proposed to build 60 homes in place of 45 ... an increase of 33% !! This will bring much more traffic along the already very narrow Tannery Lane and also make huge problems, traffic-wise, at its junction with the A247.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2928  Respondent: 10927553 / Marion Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also OBJECT to POLICY A58, the land at London Road, Burntcommon, where it is now proposed to use the whole triangle of Green Belt land between the A3, Clandon Road, A247, and the old dead leg of the former dual carriageway that used to be the A3 before the Ripley By-Pass was opened 41 years ago. This new proposal will now take up 10 hectares, rather than the relatively small area previously allocated, and will vastly increase traffic flows and problems in the Burntcommon area, which are already very bad, especially at peak hours. The additional industrial traffic generated by these proposals will make the problems even worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3428  Respondent: 10927841 / Frank Milton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I agree that some extra housing is needed in the Horsleys and in the Guildford borough and that a better mix of properties is needed, in particular, more properties for first time buyers and for those wishing to downsize.

However, I OBJECT strongly to the scale of extra housing proposed in the Draft Plan because this is based on some fundamentally flawed calculations and a complete lack of understanding of the environment of the Horsleys.

CONTEXT

Firstly it is necessary to understand the context of the plan, particularly as it relates to the Horsleys.

1. The basis of the plan
A consultancy, GL Hearn, produced the SHMA but have not disclosed to the Council or to anyone else details of the input assumptions or mathematical model on which their calculations have been made. That their forecast is 70% above that of the accepted figure from other sources may give you some cause for concern. Without a full understanding of the assumptions, you cannot be sure that your plans are firmly based. This is not the right way to manage such a critical input to the local plan and as a consequence your predictions lack credibility.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3429  Respondent: 10927841 / Frank Milton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the basis on which the housing requirements have been calculated. As they are not transparent they lack credibility.

1. I OBJECT to the final target housing number (based on a mathematical model which has not been disclosed) which is almost 70% higher than the official national estimates for population growth in the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3810  Respondent: 10927841 / Frank Milton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Environment of the Horsleys: The Horsleys are ill equipped to cope with significant development as any rational analysis will quickly expose. a) The road network East and West Horsley can only be accessed on restricted roads. From the South Ockham Road South is restricted so that a lorry and car cannot pass at Lynx Hill and the road remains narrow into the village. The Street has limited access at the Bell and Colville roundabout and near Edwin road it is reduced to single file traffic. From the North Ockham Road North is a narrow country road which can’t take two lorries passing. Old Lane is narrow, with a number of hazardous bends and a difficult junction into Cobham road. From the West The road from Cobham is the best route into Horsley but it is restricted at the railway bridge on Forest road. This road takes a lot of traffic as it is the access road from Horsley to supermarkets at Cobham. From the East A series of narrow roads provide access.
from Burntwood but none are capable of sustaining significantly increased traffic. b) Retail Structure The retail environment at Station Parade consists of 25 premises plus 3 at the bottom of Cobham Way, including a library, post office, chemist, 5 restaurant/cafés, butcher, baker and 2 mini supermarkets. The largest of these units are approximately 170-200 sq. m. There is no room for expansion of retail premises nor for the provision of extra parking places. This cannot be expanded or developed to a worthwhile retail centre. Bishopsmead, to the south of East Horsley is much smaller and similarly constrained. West Horsley has virtually no retail presence. c) Infrastructure There is already pressure on school places, doctors surgeries and parking. The Horsleys cannot sustain a significant increase in demand. In addition, there is limited space for expansion of any of these facilities. d) The Geography of the Horsleys The Horsleys lie just north of the A246 which runs to the north of the North Downs. Rainfall on this area flows north and causes periodic flooding in heavy rain. There are frequent problems with storm drains flooding in the Horsleys. Green belt land in and around the Horsleys is needed to absorb this water run off. Further building will exacerbate this problem. SPECIFIC OBJECTIONS 1. I OBJECT to the basis on which the housing requirements have been calculated. As they are not transparent they lack credibility. 2. I OBJECT to the final target housing number (based on a mathematical model which has not been disclosed) which is almost 70% higher than the official national estimates for population growth in the Borough. I OBJECT to the lack of understanding of the infrastructure constraints of the proposed new households on the Horsley villages and to the absence of any effort to deal with them If around 2,600 new houses were built in the Horsleys, Ockham and Wisley airfield this could easily result in around 5,000 more cars within a three mile radius of the villages. Traffic This would have a huge impact on local roads which as outlined above have little scope to be widened (e.g. pinch point at Lynx Hill on Ockham Road South and the restricted area on East Lane) or otherwise altered to cater for such an increase. Although it is proposed to upgrade the current A3 junction at Burntcommon to a full 4-way junction. SCC traffic modelling anticipates increased use of Guileshall Lane, Hungry Hill Lane and Tithebarns Lane (all not suitable for increased traffic volume) for traffic accessing the A3 at Burntcommon in order to travel to Guildford and beyond. The SCC report states that “consequently, it indicates that further thought may have to be given to managing traffic in this area as part of a transport assessment should the development be progressed”. A local plan when proposing new housing on a substantial scale must surely plan for the implications of increased traffic both on the major roads such as the A3 and the minor village roads. The current draft local plan has not given such issues enough consideration Parking Parking at Horsley & Effingham junction stations (which are already full), at the shops, at the Horsley medical centre and at the village hall will not be able to cope with this additional demand. Flooding The site behind Ockham Road North in East Horsley is partially a level 3 flood risk area, and local residents are well aware of how much standing water there is in their gardens after rain. Building on such land will only exacerbate the problem. Other areas of the Horsleys are also flooded when it rains become the drains are inadequate. Substantially more houses will exacerbate the problem but no attention has been paid to drainage in the local plan. • Schools and medical facilities Amenities Local schools and medical facilities are already at capacity. No extra school places are planned in the Horsleys and the school places proposed at Wisley Airfield will not planned until many years into the project. 2600 new houses could easily mean 2600 children looking for school place! I trust the Council will review its Local Plan basing it on a model which is available for inspection and with more attention to the infrastructure implications and use of brown field sites rather than destroy our precious Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Horsleys are ill equipped to cope with significant development as any rational analysis will quickly expose.

1. a) The road network

East and West Horsley can only be accessed on restricted roads

From the South

Ockham Road South is restricted so that a lorry and car cannot pass at Lynx Hill and the road remains narrow into the village.

The Street has limited access at the Bell and Colville roundabout and near Edwin road it is reduced to single file traffic.

From the North

Ockham Road North is a narrow country road which can’t take two lorries passing.

Old Lane is narrow, with a number of hazardous bends and a difficult junction into Cobham road.

From the West

The road from Cobham is the best route into Horsley but it is restricted at the railway bridge on Forest road. This road takes a lot of traffic as it is the access road from Horsley to supermarkets at Cobham.

From the East

A series of narrow roads provide access from Burntwood but none are capable of sustaining significantly increased traffic.

1. b) Retail Structure

The retail environment at Station Parade consists of 25 premises plus 3 at the bottom of Cobham Way, including a library, post office, chemist, 5 restaurant/cafes, butcher, baker and 2 mini supermarkets. The largest of these units are approximately 170-200 sq. m. There is no room for expansion of retail premises nor for the provision of extra parking places. This cannot be expanded or developed to a worthwhile retail centre. Bishopsmead, to the south of East Horsley is much smaller and similarly constrained. West Horsley has virtually no retail presence.

1. c) Infrastructure

There is already pressure on school places, doctors surgeries and parking. The Horsleys cannot sustain a significant increase in demand. In addition, there is limited space for expansion of any of these facilities.

1. d) The Geography of the Horsleys

The Horsleys lie just north of the A246 which runs to the north of the North Downs. Rainfall on this area flows north and causes periodic flooding in heavy rain. There are frequent problems with storm drains flooding in the Horsleys. Green belt land in and around the Horsleys is needed to absorb this water run off. Further building will exacerbate this problem.

SPECIFIC OBJECTIONS

1. I OBJECT to the basis on which the housing requirements have been calculated. As they are not transparent they lack credibility.

1. I OBJECT to the final target housing number (based on a mathematical model which has not been disclosed) which is almost 70% higher than the official national estimates for population growth in the Borough.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16085  Respondent: 10927841 / Frank Milton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposal that Station Parade in East Horsley be designated as a Rural District Centre. The reasons for this are obscure but it is patently unsuitable for the type and scale of developments that that designation allows.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14014  Respondent: 10927841 / Frank Milton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the lack of understanding of the infrastructure constraints of the proposed new households on the Horsley villages and to the absence of any effort to deal with them.

If around 2,600 new houses were built in the Horsleys, Ockham and Wisley airfield this could easily result in around 5,000 more cars within a three mile radius of the villages.

Traffic

This would have a huge impact on local roads which as outlined above have little scope to be widened (e.g. pinch point at Lynx Hill on Ockham Road South and the restricted area on East Lane) or otherwise altered to cater for such an increase.

Although it is proposed to upgrade the current A3 junction at Burntcommon to a full 4-way junction. SCC traffic modelling anticipates increased use of Guileshall Lane, Hungry Hill Lane and Tithebarns Lane (all not suitable for increased traffic volume) for traffic accessing the A3 at Burntcommon in order to travel to Guildford and beyond.

The SCC report states that “consequently, it indicates that further thought may have to be given to managing traffic in this area as part of a transport assessment should the development be progressed”. 

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A local plan when proposing new housing on a substantial scale must surely plan for the implications of increased traffic both on the major roads such as the A3 and the minor village roads. The current draft local plan has not given such issues enough consideration.

Parking

Parking at Horsley & Effingham junction stations (which are already full), at the shops, at the Horsley medical centre and at the village hall will not be able to cope with this additional demand.

Flooding

The site behind Ockham Road North in East Horsley is partially a level 3 flood risk area, and local residents are well aware of how much standing water there is in their gardens after rain. Building on such land will only exacerbate the problem. Other areas of the Horsleys are also flooded when it rains become the drains are inadequate. Substantially more houses will exacerbate the problem but no attention has been paid to drainage in the local plan.

- Schools and medical facilities

Amenities

Local schools and medical facilities are already at capacity.

No extra school places are planned in the Horsleys and the school places proposed at Wisley Airfield will not planned until many years into the project. 2600 new houses could easily mean 2600 children looking for school place!

I trust the Council will review its Local Plan basing it on a model which is available for inspection and with more attention to the infrastructure implications and use of brown field sites rather than destroy our precious Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14010  Respondent: 10927841 / Frank Milton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT strongly to the proposal to remove the Horsleys (and other villages in the Borough) from the Green Belt. In paras 79 and 80 of the NPPF (National Planning Policy Framework - Mar 12) the Government places great importance on the Green Belts and in Para 83 states that once established they should only be altered in “exceptional circumstances” through the preparation or review of the Local Plan.

The Green Belt around the Horsleys serve all 5 of the purpose set out in para 80.

Para 84 states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.
The draft plan does not identify the “exceptional circumstances” required to remove the Horsleys (and other villages) from the Green Belt nor the “very special circumstances” required to build on Green Belt land.

As outlined above, the green belt is not just a pleasant amenity but also an essential protection against flooding.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/14011</th>
<th>Respondent: 10927841 / Frank Milton</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I OBJECT to the proposed in-setting boundary to replace the Green Belt around East and West Horsley. This new boundary includes some valuable green community space such as Kingston Meadow (by EH Village Hall) and Horsley Tennis and Cricket Club which will then be vulnerable to future development. These spaces are valuable amenities and are an essential part of the life of the village.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<tr>
<th>Comment ID: PSLPP16/16083</th>
<th>Respondent: 10927841 / Frank Milton</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I OBJECT to the fact that this inflated final target housing number results in: • up to a 35% increase in the number of households in West Horsley. • up to a 90% increase in housing stock taking into account the two Horsley villages, Ockham and the proposed development at Wisley airfield. The infrastructure of the Horsleys as outlined above cannot support this expansion. In addition, 65% of new houses in the Borough are to be built on land that is currently in the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<tr>
<th>Comment ID: PSLPA16/2847</th>
<th>Respondent: 10927969 / Nadine Gibson</th>
<th>Agent:</th>
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</thead>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the plans for Send.

I object to Send Village being removed from the Green Belt, Local councillors gave an election promise to protect the Green Belt and this reneges on this.

I object to the Building of 400 houses and 7000 sq metres of Industrial Space at Garlicks Arch, the site floods and is ancient woodland.

I object to 40 houses and 2 travellers pitches at Send Hill, this road is too narrow to cope with this.

I object to a new interchange with the A3 at Burnt Common as Send would become gridlocked as it is already struggling, noise and pollution levels would be too great.

Please show my concerns to the planning officer and I would be grateful if you could acknowledge receipt of this email.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

- there is already very little infrastructure in the area, and what is there is at its limits.
- from 7 on in the morning the A3 is a stand still, as are parts of Ripley. In the afternoon don't even try to drive into Ripley, since one sits in a queue starting at the northern exit ramp.
- roads around Ockham are narrow, with no sidewalks, but deep potholes
- water supply and sewer systems are already today inadequate
- the schools are full, NHS doctors offices overrun -just try and get an appointment, not to talk about public transport with one bus line showing up very irregularly .

And to that GBC wants to add at least 6000 people with roughly 3000 cars???
A few new entrance and exit ramps won't mend that traffic density, not to mention the air pollution, nor all the other resulting problems.

This latest Guildford Local Plan won't keep northern Surrey a desirable living area with reliable household incomes which support the local community, but will destroy it into an overpopulated suburban area with the foreseeable amount of social problems.
Please reconsider the decision with your conscience.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/451  Respondent: 10928097 / Tina Foulkes  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- we all know, we need some new housing. But a disproportionate housing increase of 2x what is there currently is irresponsible.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/205  Respondent: 10928097 / Tina Foulkes  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I must say I was taken by surprise that the revised draft Local Plan for Lovelace with marginal changes to the former draft was pushed through, although just a few days earlier the GBC planners had unanimously shot down a centrepiece of it.

To me as a citizen, it seems that the various GBC boards don’t talk to one another, or that some have a secret agenda for very personal reasons.

- how can it be that a local council decides to withdraw parts of their land out of an national protected area, the Green Belt just to ease its planning challenges? Politicians should look at the impact of their actions for future generations and not just shortsighted to the next election and how to make their job easier.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9655  Respondent: 10928257 / Alessia Mestrone  Agent:
I'm writing this email in order to OBJECT to any development on Greenbelt land as proposed in the 2016 Local Plan for Guildford.

While I appreciate the need for more housing I believe that building on the Greenbelt land should not be the solution. More houses can be provided making a better use of the town center unused spaces and the brownfields not destroying that green areas which are so important from many point of views: historically, culturally, scientifically and a heritage we must treasure for the next generation. In particular, the proposed developments on the Hog's Back and Blackwell Farm (which I think should be included in the AONB and carefully safeguarded!) will inevitably destroy the amazing landscape which many horseriders, bikers, hikers, people of any age enjoy and love and the habitat of many precious wildlife and plants. Sacrificing the Greenbelt Land and trade it with more traffic, congestion, more pollution, insufficient infrastructures would be a terrible mistake.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2525  Respondent: 10928385 / Ken Miller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6674  Respondent: 10928513 / Lorraine Snell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My name is [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] and I am writing in objection to the draft local plan for Send Village being removed from the green belt. I moved from Woking to Send to find a quieter way of life with less traffic and congestion and I am appauled to see the proposal for multiple developments will turn Send into another Woking/Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/6675  
Respondent: 10928513 / Lorraine Snell  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The local plan is not sustainable and I object to the late inclusion of A43 Garlicks Arch, the proposed Wisley Airfield which will put untold strain on local roads. The developement is disproportionate in one borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2070  
Respondent: 10928577 / Johan Stalmans  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The scale of the proposed housing development in the Horsley area is totally inappropriate when compared to the existing number of houses in the area. The number of new homes proposed in the plan appears to have been generated from the Strategic Housing Market Assessment and further inflated, ostensibly to account for population growth (but using growth forecasts which are two-thirds higher than the national estimates for population growth in the borough). The basis of the numbers is highly questionable, being the result of a theoretical model (the algorithms and assumptions of which are not offered for critical review).
The proposed development would NOT respect the character and density of the local area, as is required by the National Planning Policy Framework.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The local infrastructure is already under severe pressure.

1. Parking at the shopping parade is difficult at best. The high volume of traffic poses a real risk to elderly and less mobile, as cars jostle a vie for the limited parking.
2. The local schools (of all stages) are operating at or very near full capacity. Forcing children to commute significant distances to their schools is damaging to their development (prolonging their school day by commuting and reducing time for recreational activities), exposes them to risks from traffic, adds to road congestion and is therefore damaging to the environment. The local education establishments have NO capacity to absorb any significant increase in students.
3. Surface water drainage. The roads in the area are already prone to local flooding during heavy rain. (Ockham Road North by the A3 junction; The Street at the railway bridge by the Barley Mow, …) Adding so many new homes will greatly increase the impermeable “hard surfaces” which will prevent the absorption of rain water and therefore inundate the local drainage system.
4. Traffic congestion at peak times is becoming more of a problem as time goes by. The A3 junction with the M25 and the A3 at Cobham come to a complete standstill EVERY DAY (I experience this on my daily commute to Staines.) Adding so many households (many with two cars per family) would cause more jams and grid-lock.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing to object to the proposals for disproportionate development plans in the area of the Horsleys, Ockham, Ripley and Wisley Airfield.

The plan centres round the removal of the villages from the Green Belt. There is absolutely no special circumstance that justifies the redefinition of the village boundaries or removing the villages from the Green Belt. The purpose of the Green Belt was to provide a buffer zone protecting London from the creeping urbanisation and to provide a “Fresh Air” corridor. Allowing the reclassification of areas within the Green Belt would set a dangerous precedent leading to unchecked development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8641  Respondent: 10928577 / Johan Stalmans  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In summary, the proposed plan for the area is completely inappropriate, unsustainable and damaging to the environment. I urge Guildford Borough Council to reconsider and formulate a more reasonable plan, limiting to a few dozen houses, in keeping with the local architecture and density.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2131  Respondent: 10928737 / Guy Pashley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
- failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability and
- flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2121  Respondent: 10928737 / Guy Pashley  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as III as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.
4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

1. POLICY A25 - Gosden Hill Farm

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.
I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.
Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/2126  **Respondent:** 10928737 / Guy Pashley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/4233  **Respondent:** 10928737 / Guy Pashley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.
The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 – 2014 from Crashmap data

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Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.
The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/4238  **Respondent:** 10928737 / Guy Pashley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council’s eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).
The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8997  Respondent: 10928737 / Guy Pashley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I OBJECT to Policy D3 - Historic environment</td>
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<td>I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.</td>
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<td>I OBJECT to Policy D4 - Development in urban areas and inset villages</td>
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<td>The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.</td>
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<td>The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.</td>
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I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8987  Respondent: 10928737 / Guy Pashley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.
Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8992  Respondent: 10928737 / Guy Pashley  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9048  Respondent: 10928737 / Guy Pashley  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is
likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9028  Respondent: 10928737 / Guy Pashley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.
There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9018  Respondent: 10928737 / Guy Pashley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9023  Respondent: 10928737 / Guy Pashley  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9043  Respondent: 10928737 / Guy Pashley  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9003  Respondent: 10928737 / Guy Pashley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy 11. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.
Policy 11 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9008  Respondent: 10928737 / Guy Pashley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9013  Respondent: 10928737 / Guy Pashley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8971  Respondent: 10928737 / Guy Pashley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The...
fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.
There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/8976 | Respondent: 10928737 / Guy Pashley | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/8961 | Respondent: 10928737 / Guy Pashley | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1 |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on the existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”.

Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.
The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 10928737 / Guy Pashley</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

2. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** SQLP16/1244  **Respondent:** 10928737 / Guy Pashley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites-which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation

2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation

3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound

4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018

5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars

6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham

7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework

8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Comment ID: SQLP16/1249  Respondent: 10928737 / Guy Pashley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1775  Respondent: 10928769 / John Slatford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the new proposal for AT LEAST 400 new homes at the Garlic’s Arch site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>Provision of slip roads at Burnt Common is a Highways England matter not Guildford Borough Council.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to the apparent lack of any provision for new infrastructure, that is; roads, schools, medical or hospital facilities, etc.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>• There are already far too many problems with traffic and congestion within the Borough and, seemingly, nothing in the Plan to deal with the inevitable increase resulting from the plans for new housing and population.</td>
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<tr>
<td>Finally, I am extremely worried about the apparent plan to merge all of our villages along the A3 and the resultant effects this will have upon our respective communities.</td>
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Page 1015 of 2167
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3821  Respondent: 10928769 / John Slatford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of our villages, especially Ripley, Send, Wisley and Clandon, from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3819  Respondent: 10928769 / John Slatford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object most strongly to a number of issues within the Plan as follows:

The Plan appears to state a need for over 7000 new homes to be built within the Borough. I cannot believe that Guildford is due to receive such a disproportionate increase.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/725  Respondent: 10928769 / John Slatford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents
<table>
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<td>What evidence is there to show that all these new homes are needed.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 &amp; para. 4.1.9], which:</td>
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<td>• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]</td>
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<td>• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&amp;E – and will also encourage rat-running through residential areas</td>
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<td>• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]</td>
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</table>
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPA16/1065  **Respondent:** 10928897 / Patricia Farmer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

What evidence is there to show that all these new homes are needed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/1675  **Respondent:** 10928897 / Patricia Farmer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I Object to the new proposal for AT LEAST 400 new homes at the Garlicks Arch site. Provision of A3 slip roads at Burnt Common is a Highways England matter not Guildford Borough Council.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/3663  **Respondent:** 10928897 / Patricia Farmer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I Object to the apparent lack of any provision for new infrastructure that is: roads, schools, medical or hospital facilities etc. There are already far too many problems with traffic and congestion within the Borough and seemingly, nothing in the Plan to deal with the resultant inevitable increases of new housing and population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3662  Respondent: 10928897 / Patricia Farmer  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I Object to the removal of our villages, especially Ripley, Send, Wisley and the Clandons, from the Green Belt.

Finally, I am extremely worried that the Plan will effectively merge all our villages along the A3 north of Guildford and the resultant effects this will have upon our respective communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/3661  Respondent: 10928897 / Patricia Farmer  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

The Plan appears to state a need for over 7000 new homes to be built within the Borough. I cannot believe that Guildford is due to receive such a disproportionate allocation.

I Object to the apparent last minute inclusion of new development sites, obviously intended to create even more confusion and uncertainty.
**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPA16/3108</th>
<th>Respondent:</th>
<th>10928929 / P C Cooper</th>
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<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to the 2016 draft local plan for the following reasons and would like my comments to be seen by the inspector:

I object to Send, Ripley and the surrounding villages being removed from the Green Belt. Our MP promised to protect the Green Belt yet the local plan is proposing to remove 15 villages from the Green Belt, this is unacceptable.

I object to the plans for Garlicks Arch. Our infrastructure is already struggling with the current occupancy in the area. Our roads are regularly gridlocked, particularly Send Road and Send Marsh Road with the flow of traffic onto the A3, which would only increase with an extra 400 houses and services to the proposed industrial units. Services such as the local schools and doctors are already at full capacity, with it being increasingly difficult to get a doctors appointment even for young children. This issue would only amplify with the proposed developments. Our roads and pavements are already in a state of disrepair and an increase of pedestrians and vehicles will only make this matter worse.

I object to the proposed A43a on/off ramp at Burnt Common as again this will only increase the quantity of traffic in the area, which is already struggling.

I object to the disproportionate amount of development in one area of the borough, our villages will lose their identities and blend into one.

I object to the inclusion of 2 travellers pitches at Send Hill, I can not understand why this would benefit our village and why any borough would actively encourage these pitches.

I object to the way in which many items of the local plan have been introduced. I do not believe Guildford Borough Council have followed correct process by introducing last minute additions and alterations which warrant a full consultation period not the short cut that it appears to be.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID:</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I object to the proposal in the local plan on the grounds that the site is not large enough to the proposed use.

I object to the proposal in the local plan on the grounds that it would cause adverse impact on street parking.

I object to the proposal in the local plan on the grounds that Send Hill is a single track country road and too narrow to provide sufficient access to the site or accommodate the potential new levels of traffic the proposed development would bring.

I object to the proposal in the local plan on the grounds that Send is in green belt. The proposed inset is inappropriate due to its permanent green belt status.

I object to the proposal in the local plan on the grounds that Send Hill is a narrow road result in loss of a turning point for vehicles.

I object to the proposal in the local plan on the grounds that it would impact the nature reserve nearby. The proposed site is a quality green belt amenity area within countryside and would be spoilt by development.

I object to the proposal in the local plan on the grounds that the existing road and parking infrastructure is already inadequate or under pressure and could worsen with the planned development, reduci ng quality of life.

I object to the proposal in the local plan on the grounds that too many houses are proposed to Send/Send Marsh are and the impact on traffic congestion and local services would be unacceptable.

I object to the proposal in the local plan on the grounds that both the Envirosearch Report RS 1100201-1-1 dated 17th February 2004 and historical map data and information from GBC has identified site as landfill and has "areas of potentially contaminative industrial activities". Development of this site would be a health hazard. The recent news reports of a child dying from seepage of contaminated ground following flooding prove that developing any such sites is a danger to health. The Daily Mail has also recently had an article on how dangers of living near landfill site raises cancer concerns. The paper referenced a study published by the international journey of Epidemiology which tracked 242,000 people living near landfill sites in Italy.

I object to the proposal in the local plan on the grounds that both Envirosearch Report RSI 110001-1-1 dated 17th February 2004 identifies "potential risk from landfill gas migrations “which I believe is a health hazard .

I object to the proposal in the local plan on the grounds that both Envirosearch Report RSI 100201-1-1 dated 17th February 2004 Concludes "potentially contaminative industrial sites identified from analysis of Ordnance survey maps.

I object to the proposal in the local plan on the rounds that the Southern County Searches (Sitescope Ltd) report E.2978.SN-HCP dated 5 January 2005-Identifies proposed site as a local authorized landfill site as licenses under Part 11 of Environmental protection Act 1990. The proposed site is not a quarry as specified in The GBC Local Plan. Therefore not suitable for the proposed usage.

I object to the proposal in the local plan on the grounds that the Southern County Searches (Sitescope Ltd) report E.2978.SN-HCP dated 5ili January 2005-Identifies proposed site as potentially contaminative industrial land. With usage of "Heap and unknown constituents". This causes me concern as to what it does contain and dangers if disturbed.
I object to the proposal in the local plan on the grounds that the Southern County Searches (Sitescope Ltd) report E.2978.SN-HCP 5th January 2005 Identifies changes to proposed site could cause potential ground water vulnerability to my property.

I object to the proposal in the local plan on the grounds that the Traveller Accommodation Assessment research, purported to have been undertaken in June-July 2012 by Mill Field Services, cannot be so. The Sittingbourne based market research company was dissolved in January 2011 according to the government companies site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/1869  **Respondent:** 10929025 / Richard Williams  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (No), is Legally Compliant? (Yes)

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this plan Not only has the planned number of proposed houses risen substantially from the draft plab 2014 but more importantly 65% of new houses are to be built on Green Belt designated land

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/2465  **Respondent:** 10930081 / Helen Court  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the building on the Green Belt at Send at Garlick's Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that the Green Belt is meant to be permanent and not continually eroded.

I object to the proposed sites in Send (all of them because they were not included in the previous consultation in 2014. Unlike the rest of the borough, Send has not been properly consulted and the proposed sites have been changed substantially.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed new interchange onto the A3 at Burnt Common because it would be disaster our for Send and the A247 would be gridlocked all day.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10238  Respondent: 10930081 / Helen Court  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of immediate provision for new schools - the new Send Primary building is currently under construction with no space for additional classes

I object to the lack of any immediate provision for Doctors surgeries - we already struggle to get an appointment in our current surgery - more houses will make this impossible

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10236  Respondent: 10930081 / Helen Court  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the erosion of the Green Belt that protects our beautiful villages -
I object to any "in-setting" of any villages from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10237  Respondent: 10930081 / Helen Court  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate amount of development in one area of the Borough
I object to the limited consultation period
I object to the last minute inclusion of new sites with less than 2 weeks notice
I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open nature of the borough and produce gridlock on the A3 and surrounding roads - including the A247 which are already at 100% capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10239  Respondent: 10930081 / Helen Court  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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8. I object to the addition of more cars on our already congested roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4095  Respondent: 10930305 / M.S. Hollins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Over the years, the village increase in size and so has the traffic most of which is heading to the traffic jams on the A3 and M25. I therefore OBJECT to the inclusion of a further A3 junction at Burnt Common.

As a long time resident I believe that the area cannot take any increase in population or traffic. AND I OBJECT to the proposal to put large industrial buildings on Garlick's Arch farmland.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4094  Respondent: 10930305 / M.S. Hollins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

I OBJECT to the destruction of all Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the enlargement of the village area of Send, Send Marsh and Burnt Common. I have lived in Send for over 60 years and have seen the village increase in size without any increase in school places or size of the doctor's surgery. We only have ONE surgery to cover the whole area and yet you want to add a further 500+ families.

I think that Guildford's plan is no use to local residents,

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1806  Respondent: 10930561 / Robert and Gill Churchlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is no need for a 25% increase in the housing stock in Guildford Borough. This greatly exceeds any reasonable expectation for net household formation. The ONS predicts a 15% increase, but this will inevitably need to be reduced significantly once BREXIT is achieved. The 25% increase also includes a very basic fundamental error of double-counting, as highlighted in the submission by East Horsley Borough Council on 13th June 2016. I suggest you get some new statisticians. It is also wrong to suggest that such growth is being driven Central Government Policy. Under NPPF rules Guildford Borough Council is allowed to take into consideration the protection of the Green Belt and Areas of Outstanding Natural Beauty in setting its housing targets. Why is it not doing so? The Council HAS a choice and we absolutely REJECT the policy of "forced growth" that is being proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3548  Respondent: 10930561 / Robert and Gill Churchlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We also object strongly to the development of a New Town at Wisley Airfield. It is in clear contravention of Green Belt policy and would have devastating impact on the countryside, its wildlife and on the surrounding villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7820  Respondent: 10930561 / Robert and Gill Churchlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Our villages are at their limits when it comes to infrastructure - roads, schools, doctors' surgeries etc. What we find incredible is that the Plan says very little about how this infrastructure is going to be upgraded for the planned growth - and who is going to pay for it? In East Horsley the Medical Centre is full and when one can get an appointment to see a doctor there is never anywhere to park. The Raleigh School is full. The main road through the village (Ockham Road North and South) cannot cope with the current traffic flows, let alone any increase. Any time we have significant rainfall the road floods. It is also very dangerous for pedestrians to walk along the narrow and uneven pavement, particularly at night. Where are the specific proposals in the Plan to deal with the very real issues facing residents? Where are the specific plans to upgrade the infrastructure to cope with forced growth that is being proposed?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7818  Respondent: 10930561 / Robert and Gill Churchlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

The Plan is presented in a way that is dishonest in the extreme, even by current political standards. The suggestion that "We will continue to protect the Metropolitan Green Belt" is a complete lie. No less than 65% of the Plan's development will take place on current Green Belt land! Did somebody think we wouldn't notice? This is a totally unacceptable and unnecessary destruction of our countryside and our way of life.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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The proposal to inset our villages (including our village, East Horsley) from the Green Belt rather than being washed over is completely unacceptable. Our villages make an important contribution to the openness of the Green Belt as is obvious to anyone who takes the time to look for themselves. A very large part of East Horsley is woodland and housing density is extremely low. It is the Green Belt that has preserved the rural character of the village, which is why we choose to live here. The current status has allowed controlled and balanced expansion of the village - why change this?

The proposals to change the settlement boundaries for the village are a blatant attempt to created more land for development. Green Belt boundaries can only be changed in "exceptional" circumstances and a desire to build more houses is certainly not exceptional. The current boundary to the west side of Ockham Road North is defined by a deep drainage ditch which is itself a defensible Green Belt boundary, whose defensibility would in no way be improved if it was moved.

The proposal to take Kingston Meadows out of the Green Belt is equally unjustified and egregious. It provides the main recreational space in the village and the suggestion that it would be developed would be catastrophic for the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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It seems incredible that, after such an overwhelmingly negative response from residents to the previous Plan, that so few of the objections have been taken into account in this latest draft. What is the point of consultation if you are not going to listen?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In conclusion we object in the strongest possible terms to the forced growth in the Plan and the resultant destruction of our villages and way of life.

We have read and fully support the submissions made by East Horsley Parish Council on 13th June and 4th July.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/106  Respondent: 10930561 / Robert and Gill Churchlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We strongly object to the proposal to inset the village of East Horsley from the Green Belt. East Horsley is a rural village of very low housing density. Within the current settlement area the average density of housing is just 8 dwellings per hectare. Most houses lying within the current settlement area have large gardens that are filled with trees, shrubs and open lawns.

As a result East Horsley makes an important contribution to the Green Belt of this area, providing openness, picturesque green spaces and wildlife corridors which support a rich biodiversity. If East Horsley is inset from the Green Belt, as proposed in the revised Local Plan, then important Green Belt planning protection will be lost over land currently within the settlement area. This will inevitably lead to increased development within this area and the loss of openness, destruction of trees and hedgerows, diminished biodiversity and the impairment of picturesque views of this rural village.

We also strongly object to the movement of the settlement boundary, increasing the settlement area by 37%. Our infrastructure is already creaking and will simply not be able to cope with the increase in development. It will destroy the nature and character of our village and seriously impact on our way of life.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1200  Respondent: 10930561 / Robert and Gill Churchlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Why is the Wisley Airfield project still in the Plan? It was widely rejected by planners and is almost universally objected to by local residents. It would be catastrophic for the area and we object to it still being in the Plan.

The Plan fails to acknowledge the already stretched infrastructure and it completely fails to meet the objective of providing infrastructure to support new development. Who is going to pay for all this?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/242  Respondent: 10930561 / Robert and Gill Churchlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The plan is proposing far too many houses. The plan says that 654 new houses are required, an increase of 22%. This compares to a 10 year forecast population growth of only 10.4%. Furthermore, this figure takes little into account for the impact of Brexit, which will have a material negative impact on population growth over the projected period. The adjustments for additional affordable housing need, over and above the 40% required within new development, are bizarre. Why is the plan proposing to build more than twice the number of houses required (even before adjusting for Brexit)?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/244  Respondent: 10930561 / Robert and Gill Churchlow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposal to build on Green Belt land is scandalous. The proposal is against central Government policy and unmet housing need does NOT represent the "very special circumstances" required. The arguments for the reducing the Green Belt do NOT meet the required planning criteria for removal. There is almost overwhelming opposition from current residents for this proposal, so why is it still in the Plan?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** pslp172/3581  **Respondent:** 10930849 / Benthe van Druten  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

From experience (daily), I can assure you that the roads in Ockham, Ripley are already completely congested. Between 7.30 and 9.30 am it is hardly possible to go anywhere, as Ripley and the A3 are completely congested at that time. Also, if we would like to travel by train, there is hardly any or no parking space left at Effingham Station.

In your plans you mentioned other train stations like Weybridge, Woking, Cobham, which will take you an hour to get there during rush hour.

An increase of approximately 4000 cars would make life impossible as it will completely clock up the roads. I speak from personal experience as I drive my children to school every morning and my husband uses the train from Effingham.

Nowhere in your plans have you explained how you will solve the infrastructural issues. Just creating an access road to the A3 round-about in Ripley will not solve this issue as this round-about to enter the A3 is already congested during working hours and in addition to that if you would like to go through Ripley the road is also congested.

In our area there are also lots of tractors, horses and cyclists on the road. If you will increase the traffic with about 4000 cars, you should think of an A&E station or an ambulance on stand-by for 24/7 as it will create dangerous situations on the already narrow roads.

Also, the submission plan is unreliable due to some errors in the plan, the poor quality and lack of transparency in the evidence base and the accessibility of the evidence base.

I furthermore would like to stress that It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location. Also the site is further from railway stations than any other identified strategic site and it is on the the border of the most congested road network in the county and close to one the most congested junction in the country (J10)

Any public transport provision such as bus services to/from Guildford will be negatively affected.

Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. As already mentioned: this is totally unrealistic and unsafe!!

The site is also on the border with RHS Wisley, which is the most popular visitor attraction in the south-east and visitor numbers of this attraction will increase by 500,000/annum.

Furthermore, and very important to us: we object to the increased area of the site as this now abuts additional heritage assets, including our house: Bridge End House and Upton Farm The increased area will negatively impact the setting of our house and Upton Farm.

Also, I object to the removal of additional 3.1 ha from the green belt without any justification

And what I do not understand and very much object to is the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.
I consider for the reasons listed above and many other reasons that this plan is unsound, unreliable, unacceptable and not suitable.

I require confirmation that all of these comments together with all my previous comments are passed to the Inspector.

I do not see the purpose that I have to keep writing these objections again and again as it should be enough to explain to you once. But apparently it should be explained to you over-and-over again in order for you to finally realise that it lacks clarity (which is very clear) and evidence (also very clear) and that it is just not suitable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2720  Respondent: 10930945 / Peter Perry  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the figure of 693 houses per annum in the borough being too high (Appendix D)
The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, that is more than double the figure of 322 used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3639  Respondent: 10930945 / Peter Perry  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, that is more than double the figure of 322 used in previous plans.

This figure cannot be verified because the Council will not publish the SHMA report. This lack of transparency is deplorable for a realistic consultation of the Plan to be conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPS16/5692  Respondent: 10930945 / Peter Perry  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43) Garlick’s Arch is protected from development as Green Belt. To repeat, there are no exceptional circumstances which allow for it’s removal from the Green Belt (Policy P2).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5693  Respondent: 10930945 / Peter Perry  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan states the preference is to use of previously developed land but GBC have, for no reason, removed a brownfield site at Burnt Common and replaced it with Garlick’s Arch.

It defies logic that this site could even be considered when there are so many reasons that make it wholly inappropriate:
• The site is liable to frequent flooding. The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore, the Council’s assessment is not good enough to be included in the plan.
• The transport infrastructure would become unsustainable
• It has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6957  Respondent: 10930945 / Peter Perry  Agent:
I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch is protected from development as Green Belt. To repeat, there are no exceptional circumstances which allow for its removal from the Green Belt (Policy P2).

The Plan states the preference is to use of previously developed land but GBC have, for no reason, removed a brownfield site at Burnt Common and replaced it with Garlick’s Arch.

It defies logic that this site could even be considered when there are so many reasons that make it wholly inappropriate:

• The site is liable to frequent flooding. The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore, the Council’s assessment is not good enough to be included in the plan.
• The transport infrastructure would become unsustainable
• It has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

North facing ramps to the A3 at Burnt Common would be a disaster for local communities. Whilst some locals might benefit from this access the A3 to the north, the addition will draw in a huge amount of ‘through’ traffic. (E.g. all traffic from London/M25 to Woking would go through Burnt Common, Send and Old Woking). This is not sustainable as these roads are already overloaded with no scope to be improved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 10930945 / Peter Perry</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the damage that will be caused to the historic environment as a result of the scale of the proposed development (Policy D3)
The Ancient Woodland on the Garlick’s Arch site (A43), including over 80 ancient oak trees, is something a civilized society should treasure but the vast development that is proposed would double the built area in the locality and would irrevocably damage the character of this area for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object due to the congestion that development will cause to the local village roads due to the lack of road infrastructure (Policy I1)
There is far too much traffic in our villages already and this plan will cause dramatically more congestion in Ripley, Send and Clandon, with no plan to alleviate it.

The rural roads in this area are in poor condition, narrow and many have no footpaths. To add 5000 more houses would result in dangerous and unsustainable traffic with nearly 10,000 additional cars as well as delivery vehicles to service them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11330  Respondent: 10930945 / Peter Perry  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of proper infrastructure planning for sites (Policy I1)
The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

The medical and police/emergency services to cover the 5000+ houses in the north east of the borough will simply be unable to cope, creating chaos for existing and new residents alike.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15263  Respondent: 10930945 / Peter Perry  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of proper infrastructure planning for sites (Policy I1)
The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.
The medical and police/emergency services to cover the 5000+ houses in the north east of the borough will simply be unable to cope, creating chaos for existing and new residents alike.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11332  Respondent: 10930945 / Peter Perry  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

) I object due to the congestion that development will cause to the A3/M25 trunk roads (Policy I2)
The A3 and M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. As no real improvements are possible in the timeframe of this Plan, the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not even be considered until it is clear excess road capacity is available for any new development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11324  Respondent: 10930945 / Peter Perry  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

) I object to poor air quality concerns (Policy I3)
The huge developments being proposed will lead to considerably increased congestion and to greater levels of air pollution. This will have a serious detrimental effect on local residents and their health, particularly in the North East of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15258  Respondent: 10930945 / Peter Perry  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I object to not protecting the Green Belt (Policy P2)**

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. Successive democratically appointed governments have continually supported the retention of the UK’s Green Belt. There are more than enough brownfield sites in the Guildford area that should be developed for the Plan. A perfect example is the existing brownfield site at Burnt Common that should be developed rather than the outrageous proposal for Garlick’s Arch (A43).

There are no exceptional circumstances for these villages and sites being removed from the Green Belt, as required by the National Planning Policy (Policy P2).

Central Government state clearly that housing need is not an exceptional circumstance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11307  Respondent: 10930945 / Peter Perry  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I object to the Local Plan as the proposed development is not sustainable (Policy S1)**

The local communities don’t need these houses. Garlick's Arch (A43) and Wisley Airfield (A35) have no railway stations and inadequate bus services. Almost every adult will have to have a car. It is unsustainable to build 13,860 proposed new houses– it will damage local communities by over-development, especially Ripley, Send and Clandon. The Plan has nothing to improve the infrastructure for Garlick’s Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15262  Respondent: 10930945 / Peter Perry  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the Borough Wide Strategy (Policy S2)
GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

There is too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing. Even with the overall figure being reduced, the Plan should be more balanced across the borough.

It is unacceptable to build 5,036 houses between the M25 and Burpham (about 5 miles) that will obviously lead to a merging urbanisation of identities of the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1274  Respondent: 10931489 / Samuel Ottaway  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of Send from the Green Belt, I object to the building on the Green Belt at Send at Garlick's Arch, Clockbam Nurseries and Send Hill because

I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford's urban brownfield areas much closer to existing transport hubs.

I object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the (A247) would be gridlocked all day.

I object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25.

I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially

I object to the development at Garlick's Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks' notice and without any prior consultation and is not required in terms of housing need either for the village or the borough.

I object to the proposed industrial development of 7,000 sq m at Garlick's Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA} shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available.

I object to the development at Garlick's Arch because the site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The site is also subject to flooding.

I object to building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging
into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.

I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.

I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A 247 which are all already at 100% capacity.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPS16/6362</th>
<th>Respondent: 10931681 / Sally Harvey</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A22</td>
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1. Traffic / infrastructure: Keens Lane is a very narrow lane. Many of the local residents park their vehicles on the street which makes two-way traffic impossible. Adding more homes in this area, quite frankly, is waiting for an accident (possibly fatal) to happen. There is a serious blind spot (at the small hump which makes a bend in the road in Keens Lane, just before approaching the tiny roundabout at the junction of the end of Keens Lane and Gravetts Lane). I have personally been involved in a bad near-miss situation with oncoming traffic (in the dark Winter hours), and have witnessed others in the same predicament. It is sheer madness to burden this area further with increased traffic.

1. Greenbelt: this space is protected land (according to the UK Government) so why is anyone considering building on it? If we keep "chipping away" at our greenbelt, it will be like removing bricks from a wall, one at a time. One day, there will be NO WALL left. Please please please protect this land from development, for the sake of wildlife and humans alike.
1. Flooding: once again, the subject of local flooding arises. If you build on open land, you remove the ability for the surrounding land to be resilient to flooding. Surely everyone can recognize this from the increased stories of Winter/early Spring floods throughout the country? In the Fenn Lands of Cambridgeshire they have come to their senses and realized the only way to control local flooding was to return land to its original state - a FENN (open land) soaks up excess water which PROTECTS human homes from being flooded!! They have also realized this in certain areas of London. Isn't it about time GBC learned the lesson too, before you sentence all our homes to deluges and costly repair?

I would respectfully ask and urge GBC not to pass the proposed development (please.....). Thank you.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPS16/2055</th>
<th>Respondent: 10932225 / Thomaseen Dunstan</th>
<th>Agent:</th>
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We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views form the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPS16/1366</th>
<th>Respondent: 10932353 / G.A and U.E West</th>
<th>Agent:</th>
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Secondly the Gosden Hill development will lead to a substantial increase in traffic on the local roads especially the A3100 London Road in Burpbam. The new Clay Lane link road from Slyfield will similarly add to the volume of traffic. One of the worst features of the new plan is the failure to provide a four way interchange to enable Clay Lane southbound and Gosden Hill northbound traffic to reach the A3 without travelling along the A3100. The resultant traffic jams on a road already subject to frequent delays will certainly be to the detriment of local residents. There will also be a severe increase in pollution and noise affecting the residents as well as children walking to the George Abbot school and pedestrians walking to the local shops and supermarkets. According to the aspirations set out in the Neighbourhood Plan only recently accepted by GBC developments should be "promoting high quality change and improvement" and "preserving and enhancing quality of life." It cannot be said that the new local plan achieves that result.

We therefore object to the Local Plan 2016 version.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2806  Respondent: 10932353 / G.A and U.E West  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Thank you for your letter of 2nd June in which you invited comments on the Proposed Local Plan.

Firstly, in general, the proposal to build a substantial number of new houses at several sites around Guildford will inevitably increase the congestion currently existing on many roads but especially on the A3. It will of course also put severe pressure on the infrastructure. The possibility that in several years time extra lanes will be added to the A3 as well as other measures referred to in the plan that are intended to mitigate congestion and deal with the changes to infrastructure are inadequate. In our opinion the rapid expansion of the urban area leading to loss of green belt is unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/5022  Respondent: 10932385 / Lynne Bryant  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the "historic location of Ash Green", is inadequate and would need rewording to prevent this increased potential for coalescence.

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road have historically been considered to form part of Ash Green village. Whilst this land is now proposed to be included within the Ash and Tongham urban area, Proposals for the land west of this road and to the south east of Foreman Road / White Lane should respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This should include the provision of a green buffer that seeks to maintain a sense of separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond" 

- Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected." 

- Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

- Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.

  a) The Street in Tongham
  b) A331/A323 intersection
  c) A31 /White Lane junction

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond" 

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"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected." 

Attached documents:

Comment ID: pslp171/3223  Respondent: 10932385 / Lynne Bryant  Agent:
Policy P3 - Countryside

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road
- 4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Given its relative sustainability, Countryside to the south and east of the urban area within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."
- 4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."
- Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."

4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."

Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

Attached documents:
I object to the Guildford Borough Council Proposed Local Plan (June 2016) and, in particular to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings, and the erosion of greenbelt land in East and West Horsley.

I object to the draft Local Plan for the following key reasons in respect of Three Farms Meadows:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5. I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7. I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8. I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9. I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10. I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.
After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I object to the draft Local Plan for the following key reasons in respect of East and West Horsley:

1. I object a plan that removes East and West Horsley from the Green Belt.
2. I object to a plan that includes 533 new houses in East and West Horsley.
3. I object to the erosion of farmland
4. I object to a plan that will destroy the beauty of the village in which I live.

I trust that these objections will be fully considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to changes relating to policy A43 Garlick’s Arch because:

- Again you have ignored the thousands of previous objections.
- There are no ‘exceptional circumstances’ required to develop on this Green belt.
- It will generate excessive traffic along the Clandon Road with associated noise and light pollution. This will be made even worse if the adjoining Policy A58 is implemented.
- It would appear that there is no demand for Travelling Showpeople plots.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to changes relating to Policy A58 Burnt Common because

- This Policy was deleted from the 2014 Plan following previous objections.
- Additionally i see the Plan now references ‘ Minimum’ rather than the original ‘Maximum’ referring to the 7,000 sq feet of industrial or warehousing. If the original proposal was deleted again i see no reason why the changed plan actually increases the proposed level of development.
- The impact on the Clandon Road and adjoining roads will create huge traffic issues, and noise and light pollution issues.
- There is no need to develop on this section of Green Belt land when other local sites including Slyfield and Guildford have empty existing sites and ‘brown field’ sites amiable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2600  Respondent: 10932801 / Angela Grenham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all policies which involve building on the Green Belt:

• No exceptional circumstances are shown, numbers are excessive and the clearly expressed views of residents in previous consultations ignored.

I object especially to policies A35-41:

• Amount of new housing far exceeds local need
• Housing density excessive when compared with existing development
• Would transform the Horsleys into a sizable town, something for which no case is made, and would cause significant detriment to neighbouring villages
• No local support
• Collective impact of these 6 sites on a small part of the borough appears not to have been considered
• Key infrastructure is lacking with no adequate provision
• Green Belt gap with neighbouring settlements hugely narrowed
• Site A35 has surely been included in error given that it has recently been rejected by the Planning Committee?
The Local Plan will shape the future of our historic villages and our borough. Please listen to the views of the residents. I would be pleased to see a revision to the Local Plan which preserves the Green Belt and results in proportionate development on suitable sites, enabled by infrastructure improvements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10803  Respondent: 10932801 / Angela Grenham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy I1-I4

I object to the above policies primarily because they appear to suggest that infrastructure is not being considered as a pre-condition of development. The Local Plan does not provide confirmed plans for the improvements to infrastructure which would be required to support even a proportionate amount of new housing. Much of the local infrastructure is already inadequate or at capacity, evidenced by congested and poor-conditioned rural roads, frequent flooding issues, lack of healthcare facilities and the need for First Responders and defibrillators due to distance from accident and emergency facilities.

It is essential that infrastructure improvements are confirmed and fully funded before decisions are taken on proportionate housing development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10802  Respondent: 10932801 / Angela Grenham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Green Belt is not the Council’s to give away, it belongs to us all and not just those who live within it, yet the detail of the policy suggests the Council is willing to sacrifice it. There is no commitment within this plan to protect the Green Belt, contrary to the content of the NPPF, party manifesto commitments, government policy and previous responses to public consultations.

There is no assessment of the Green Belt’s value, yet losing it results in an irreversible loss of:
• Agricultural production
• Rural leisure and tourism amenities
• Water catchment & flood control
• Natural heritage
• A carbon sink for air pollution
• Room for public facilities such as parks and burial grounds
• Profitable film locations
• Future economic potential such as mineral extraction
• Biodiversity, natural beauty, landmarks, open space, rural views and sight lines
• Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF).

The draft Local Plan suggests that most Guildford villages do not contribute to “openness”, however this is subjective. Indeed, preserving the openness of Effingham is a cornerstone of their emerging Neighbourhood Plan and fits with Paragraph 17 of the NPPF which ‘empowers local people to shape their surroundings’. I am especially concerned by the proposed ‘insetting’ of 14 villages from the Green Belt, and ‘infilling’ 12 of the borough’s Green Belt villages. It is of great concern that settlement boundaries are proposed to be extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. To ‘inset’ two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is completely inappropriate, given the stated objectives of the Green Belt in the NPPF and government policy. No exceptional circumstances have been disclosed, and therefore the Green Belt boundaries should NOT be changed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10801  Respondent: 10932801 / Angela Grenham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Local Plan proposes 13,860 new homes to be built across the borough by 2031. This figure is said to be based on an objective SHMA carried out by GL Hearn, consultants whose website openly states their pro-development agenda. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it, despite repeated requests for debate. The assumptions and calculations underlying the model have not been disclosed, protected by a claim to intellectual property. The Council say we should ‘trust the contractors’ model because it is used by a large number of other local authorities’, however this is no guarantee of objectivity. Indeed, at least two recent papers have been published (one by Guildford Greenbelt Group Councillor David Reeve and the other by an independent expert commissioned by the non-political Guildford Residents Association), which challenge the findings of the SHMA.

Furthermore, the housing number is based on projections for economic and population growth pre-Brexit, including migration. These projections now need to be revised downwards, possibly quite significantly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6464  Respondent: 10933473 / Esther and Adrian Parry  Agent:
**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A15**

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**Proposed Submission of Local Plan: Strategy & Sites (Part 2, Sites). Policy A15 Land at Guildford Cathedral.**

Please see below our thoughts on the most recent Local Plan.

We notice on page 157 you label the above land under “Existing use”: open space and residential properties, we are sure this land should be labelled “Protected Open Space”. It is our understanding that the Cathedral were only allowed to build 6 + 1 houses for their staff quarters and this was limited due to the “protected open space” status of the land and public footpaths running over the land.

We notice in your document pg. 157 the re-classification as C3 Housing, 100 homes. Note: Linden Homes have recently put in a planning application for more 134 dwellings. This is unsuitable for a grade II* Listed Building (the Cathedral) and its grounds. These 134 out of character dwellings will be highly visible from most view points. The view of the Cathedral from the north is already severely affected by the University of Surrey buildings.

The ancient tithe hedge running parallel with Ridgemount and Alresford Road is not listed in either the requirements section or key consideration section (pg. 157) of your document.

The land has a history of drainage problems and ground movement so approximately 100 or more homes will require expensive deep piling and will impact on the flooding problems and destabilization that has been experienced in Ridgemount and other immediate areas in recent years.

Finally 100 homes will generate notable extra traffic in an already congested area. Ridgemount and Alresford Road are minor roads with a heavy footfall due to the University with a pavement only on one side. This area is currently a semi-rural environment and would not be able to cope with the traffic likely to be generated by this proposal and of course this traffic would feed into the already congested Madrid Road/Guildford Park Road & contribute to the heavy traffic at the back of the train station & Guildford Town centre.

The site should remain designated as protected open space with the small number of cathedral houses. It is inappropriate to designate this site as C3 Housing and I ask for this to be seriously considered.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** pslp172/1383  **Respondent:** 10933473 / Esther and Adrian Parry  **Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A15**

<table>
<thead>
<tr>
<th>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
We have concerns on the new wording of requirements point 4 on page 176 - ‘A holistic approach to the landscaping of the site to include no unacceptable impact on existing trees and mature hedges of significance’.

The word “Unacceptable” is very vague. Please can you be more specific. The original wording 'Protect existing trees and mature hedges of significance' (a wording not in the earlier submission) is more precise and doesn't rely on an interpretation of the word unacceptable.

Please clarify the use of the words 'of significance' - does this include the need to protect trees with Tree Preservation Orders on this site and to protect the Tithe Hedge bounding the site which should be protected under the Hedgerow Regulations of 1997 as it has a continuous length exceeding 20 metres, has existed for 30 years or more and satisfies at least one of the criteria listed in Part II of Schedule 1 of the Hedgerow Regulations 1997? The new wording should not replace the existing which should be strengthened and clarified.

Fundamentally we believe the site should remain designated as protected open space with the small number of Cathedral houses. It is inappropriate to designate this site as C3 Housing.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

We have concerns on the new wording of requirements point 4 on page 176 - ‘A holistic approach to the landscaping of the site to include no unacceptable impact on existing trees and mature hedges of significance’.

The word “Unacceptable” is very vague. Please can you be more specific. The original wording 'Protect existing trees and mature hedges of significance' (a wording not in the earlier submission) is more precise and doesn't rely on an interpretation of the word unacceptable.

Please clarify the use of the words 'of significance' - does this include the need to protect trees with Tree Preservation Orders on this site and to protect the Tithe Hedge bounding the site which should be protected under the Hedgerow Regulations of 1997 as it has a continuous length exceeding 20 metres, has existed for 30 years or more and satisfies at least one of the criteria listed in Part II of Schedule 1 of the Hedgerow Regulations 1997? The new wording should not replace the existing which should be strengthened and clarified.

**Attached documents:**

**Comment ID:** PSLPA16/4054  **Respondent:** 10933569 / Rosamund Ebdon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I am a resident of Send Hill, my address is: [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] and I am writing to object to the local plan for Send village and the surrounding area.

I object to the proposals in the local plan for Send village on the grounds that Send is in the Green Belt and the proposed inset is inappropriate. Send should not be removed from the Green Belt. It provides an essential buffer between Woking
and Guildford and the nature of the village and the well being of its residents would be destroyed. The Green Belt does not need to be built on. 50% of new homes needed could be built on brownfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7543  Respondent: 10933569 / Rosamund Ebdon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposals in the local plan (Policy A 43. 30 ha land at Garlick's Arch, Burnt Common, designated 400 houses and 7,000 sq m of industrial and warehousing) on the grounds that this proposal is new, was not in Regulation 18 draft and was not consulted on previously and these houses are not needed on top of the 13,860 already proposed for the borough. It is Green Belt and has a particular conservation sensitivity due to the ancient woodland. The proposed industrial development is not required and if it were it should be located in Slyfield, not on protected Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7542  Respondent: 10933569 / Rosamund Ebdon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposals in the local plan (Policy A44.1.9 ha land west of Winds Ridge and Send Hill designated for 40 houses and 2 traveller pitches) on the grounds that Send Hill, where I live, is a single track country road with blind bends on a very steep hill and is too narrow and would be too dangerous to provide access to the site proposed in the plan. This was a new addition and was not included in the regulation 18 draft and has not been consulted on. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented and is unsuitable for housing. Disturbing the soil would be a health hazard and causes me great concern.

I object to the proposals in the local plan on the grounds that Send Hill could not accommodate the increased levels of traffic that the proposed new development would bring, this being a potential of an extra 92 cars.

I object to the proposals in the local plan on the grounds that there are too many houses proposed for Send and Send Marsh. The impact on local services including the doctors surgery and schools would be unacceptable and unmanageable.
I object to the proposals in the local plan on the grounds that the congestion caused by the increased volume of vehicles resulting from the large numbers of new houses proposed in the area, would be unacceptable. The roads are already highly congested at peak times and Send Road would become totally grid-locked and unusable. Send is already used as a rat run into Woking in the mornings and evenings and could not take any more traffic. This would utterly destroy the nature of the village and the well-being of its residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/585</th>
<th>Respondent: 10933793 / Julia Tilbury</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. **Sites in East and West Horsley**

I OBJECT in particular to including Sites A36-41 (East and West Horsley). This is a back-door way to create a mega-village- essentially, a soulless new dormitory town. The Horsleys feel victimised by this plan, which has been masterminded by Council leaders representing Ash and Tongham at the other end of the borough, where (in a flagrant case of political double standards) the Green Belt is actually being extended under Policy P3.15

Whatever their merits as development sites, the 6 Horsley sites should not be considered individually but for their cumulative impact on the contiguous villages of East and West Horsley.

Building 533 new houses on these 6 sites, plus at least another 90 on small sites is (a) excessive in absolute terms and (b) disproportionate relative to the rest of the borough. It will destroy the rural character of these communities. *16

Under the plan, rural West Horsley will take 35% of new homes, urban Ash and Tongham 16% and Guildford urban area only 11%. The total number of homes in West Horsley will increase by 35%, which is disproportionate when measured against the overall increase in housing across the borough and particularly in Guildford town. If the Council have justifiable reasons to transform a particular community so radically, the plan should present a case rather than putting forward site proposals as a *fait accompli*.

These sites will put unsustainable strain on local facilities and infrastructure, including public transport, parking, schooling, medical facilities, sewage, surface drainage and shops. For instance:

- Thames Water have advised the Council that the current wastewater network will not cope and that the foul drainage system all the way to the treatment works North of Ripley will need to be upgraded.
- Guildford Council's Education Review says "expansion options may need to be considered for primary" education in the Horsley area within the first 5 years of the plan, but Surrey County Council have no plans to do so. The Raleigh School is already full. The private Glensk and Cranmore schools are also at or near to full capacity. The suggestion that schools in Ripley can be used contradicts the plan's stated intention to reduce traffic on the A3 and strategic aim that primary schools should be within walking distance.
- The plan's Infrastructure Schedule (Appendix C) imagines an "East Horsley and West Horsley traffic management and environmental improvement scheme between 2019 and 2023 by Surrey CC" but gives no details. This scheme is just wishful thinking. The proposed housing can only harm the local environment, not "improve" it.
The harmful impact of these sites is magnified by the proximity of the so-called Wisley Airfield site (Three Farms Meadow), with over 2,000 new homes only 2 miles away (see below).

The density of new housing on the 6 Horsley sites is inappropriate, being greater than anywhere in the locality at present.

Sites situated on the periphery of existing development in the Horsleys encroach on surrounding open fields and require the extension of settlement boundaries for which the plan presents no arguments. Contrary to NPPF paragraph 79, this will contribute to creeping urbanisation by attenuating the Green Belt corridors separating the Horsleys from neighbouring settlements.

Collectively, these 6 sites militate against NPPF paragraph 81's encouragement of access to the Green Belt and its amenity and recreation value. This has been a success story in the Horsleys, with the creation of an amenity wood and community garden, the purchase of adjacent fields (on the eastern side of Ockham Road North) by local residents in order to preserve their open aspect, well-maintained pitches for local football and cricket clubs, public tennis courts, open space for a high-quality campsite (at Waterloo Farm) used by many foreign tourists and the approval of plans for a "Theatre in the Woods" making West Horsley the only village in Surrey with an opera house. The open nature of West Horsley determined that a long portion of the 2012 Olympic cycle races passed through the village. This route has since been adopted by cyclists as a permanent asset, including the annual

"14 E. Gallagher Homes v Solihull Metropolitan Borough Council [2014] EWHC 1283

"15 Councillor Paul Spooner and his predecessor, Councillor Stephen Mansbridge.

"16 Even some property developers complain about the Council's bias in favour of oversized developments, g. Dandara, whose relatively small

Prudential cycle race. These and future examples of "positive planning" depend on protecting the Green Belt to maintain the openness and attractiveness of the local landscape and avoiding the urbanisation and traffic congestion that Sites A36-41 will bring.

By surrounding Waterloo Farm campsite with 120 new houses, Policy A40 on land to the North of West Horsley will make this rural tourism amenity unviable. This may accord with developers' plans, since the site would then be vulnerable to infilling with yet more housing.

Site A40 is subject to an unacceptable flood risk from a combination of a high groundwater table and the lack of surface water run-off. This is flat, clay land on the downhill side of the Horsleys where floodwater from new development will accumulate and back up onto existing properties nearby. I can provide photographs proving how badly these fields already flood at present. These problems will only get worse with the increase in extreme weather events associated with climate change. The "appropriate mitigation" suggested in Policy A40 exists only as an abstract notion. It should not overrule the need for Green Belt "exceptional circumstances".

Policy A40 underestimates the problems of safe access and egress. Firstly, Ockham Road North was closed for several weeks in 2014 because of flooding, and still floods regularly. Secondly, access problems are not confined to flooding and are not addressed by the proposal to extend the existing 30m ph zone past the site entrance. Repeated attempts made by Ockham Road North residents to extend this zone have been turned down by the local authorities, Highways England and Surrey Police, even though data collected in 2015 show that traffic has doubled over the last 15 years and that the average speed in the 40mph section of this road is 52mph, with maximum recorded speeds of over 80mph. No traffic calming measures have so far been achieved. Additional housing will add to several hazards along this stretch of road, including:

- Its use by pedestrians, especially children (using the Raleigh and Glenesk schools and catching school buses to Guildford and Howard of Effingham), pensioners living in the string of bungalows at the northern end of the road, and visitors from the Waterloo campsite who are unfamiliar with the area.
- The existence of a narrow footpath on only one side of the road in any one spot. The layout means that walking half a mile between Green Land and East Lane requires crossing the road twice.
- The road's increasing use by recreational cyclists (see above).
• Its winding nature, poor sight lines (especially when interrupted by summer vegetation) and dangerous, concealed driveways. Most of these were built in the 1930s. Some have been widened but many are too narrow for modern traffic. Since a deep ditch runs along most of the road, vehicles have to swing out dangerously when entering or leaving.
• The prospect of additional traffic, including 19,000 HGV movements (90 a day over a long period) if Surrey County Council approves the Drift Golf Course's planning application to re-landscape its site using bulk waste transported from London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/835  Respondent: 10933793 / Julia Tilbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Three Farms Meadow site

I OBJECT also to there-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. 17 This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision - a clear signal to the developers to try again.

This is not an NPPF "presumption in favour of sustainable development" but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected. Residents are disturbed by apparent political links between the ruling Conservative group on the Council and individuals connected to the developers, a shadowy Cayman Islands company. "18

Policy A35 should be ditched from the plan for all the reasons the development was rejected by the Planning Committee, including:

• Green Belt location and absence of "exceptional circumstances".
• Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.
• Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA) .
• Proximity to A3/M25 bottleneck and Ripley village and roundabouts.

"17 Application reference 15/P/00012.

"18 Including the Rt Han. David Mellor QC (its erstwhile founder and former Minister), Mr Michael Murray (spokesman for the project and Conservative cabinet member for planning policy at the Vale of the White Horse District Council in Oxfordshire) and the Han. Charles Balfour (director, descendant of the Tory Prime Minister).
Absence of adequate traffic data.

Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.

Loss of high-quality agricultural land (55% of the site), in breach of national policy.

Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.

Presence of a Surrey County Council safeguarded waste site.

Cost of infrastructure required to the detriment of alternative more favourable sites.

Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.

Impact on listed buildings.

Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.

Extreme housing density with tiny garden spaces.

Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.

Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).

Failure to evaluate the cumulative impact of this and nearby development sites on the area.

*****

"The River Mole would flood even more badly should a new runway be built at Gatwick."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1719  Respondent: 10933793 / Julia Tilbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D1 -Making better places

I OBJECT to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force.

The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY D2 - Sustainable design, construction and energy**

I OBJECT. Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, "like a golden thread". It should be set out clearly in Policy 51, not buried away as a minor detail in Policy 02.

This policy amounts to "greenwashing", expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. This policy should not be just about saving energy but about preserving the borough's stock of natural capital, especially the countryside, from futile attempts to rig the housing market.

This policy's emphasis on Combined Cooling Heating and Power and communal heating networks is meaningless, since no such networks are available locally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY D3 - Historic environment**

I OBJECT. This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to "support development" that might "enhance" heritage assets leaves wide scope for abuse in the form of destructive commercialisation and financial leveraging of relevant sites.

This policy is based on the false premise that Guildford's heritage is inherently in decay. This is a developer's charter- a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council's aggressive reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the "reasoned justification", the actual policy wording in the blue box leaves too many loopholes.
Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1722  Respondent: 10933793 / Julia Tilbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D4 - Development in urban areas and inset villages

I OBJECT. This is a piously aspirational policy that does not address any of the obvious practical issues already touched on above:

- The plan envisages that 40% of homes built will be "affordable", but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called "affordable" homes or pay an "affordable" There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand). The number of homes planned in the urban area is too low. There is a glaring need for regeneration in many urban areas, but this is ignored in favour building homes on green-field sites instead. This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure. The plan envisages a large expansion of the traditional "bricks and mortar" retail sector, but this is a sector in rapid and continuous decline. All the stated policy aims for "inset" villages will be negated by the excessive weight of new housing development proposed which would radically change their character forever. Against this disruptive background, it is barely relevant to talk about preserving views!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1710  Respondent: 10933793 / Julia Tilbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY E1 - Meeting employment needs

I OBJECT because -

- The evidence base is unreliable;
- There is unclear differentiation between B class uses;
- Only high value-added business uses, contributing to a modern "knowledge economy", are desirable, not low-grade, low-employment warehousing which is also land hungry;
- Industrial and commercial businesses must be concentrated in the urban area or existing business parks (e.g., Slyfield) not in the rural environment which the infrastructure is unable to support;

"10 See footnote 3 above.

- The rural environment must support micro- or high-tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1711  Respondent: 10933793 / Julia Tilbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E2 - Location for new employment floorspace

I OBJECT. It would be more sensible to confine all new office and research and development (use Class B1a and B1b) floor space to Guildford town centre. I oppose the policy of expanding the Research Park onto Blackwell Farm (see my reference to "regulatory capture" of local public policy by the University, Policy H1, above). No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1712  Respondent: 10933793 / Julia Tilbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY E3 - Maintaining employment capacity and improving employment floorspace

I OBJECT. The policy of resisting change of use from B1a to residential flies in the face of positive property market solutions for the regeneration of brownfield land and is contrary to national Government policy, recently reconfirmed, which permits changes of use from B1a (offices) to C3 (residential).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1713  Respondent: 10933793 / Julia Tilbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E4- Surrey Research Park

I OBJECT. The Council are required by the NPPF to facilitate commercial science and technology clusters. But, as with Policies H1 and E2 above, this policy seems to be dictated more by the ambitions of Surrey University than the public interest. In an extremely tangled sentence, it says that the Research Park will be "protected for business use... in any science ... that is complementary to the activities of the University of Surrey."

This fails to distinguish adequately between the University's public role as a state-funded, academic institution and its private, financial interest in profit-making business spin-offs. It ignores enterprises that might be commercial rivals of the University. And it fails to consider the public harm done by turning the Research Park into a larger Business Park, such as the loss of Green Belt social and environmental capital.

B1b should be the primary use class for the Research Park and applications for B1a should be resisted given the danger of diluting the core purpose and reputation of the park. The inclusion of B1c uses is inappropriate and unnecessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1714  Respondent: 10933793 / Julia Tilbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY E5 - Rural economy

I OBJECT. Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism that require local people to be consulted and heeded, not ignored. Villages need protecting in terms of both design and scale.

Most of the economic activities listed in 4.4.44 depend on maintaining the rural character of our villages which would be endangered by the wholesale “insetting”, boundary expansion and house building proposed in other parts of the plan. This applies also to new and projected enterprises in the Green Belt (e.g. Grange Park Opera’s Theatre in the Woods in West Horsley, which requires a protected, rustic setting to be a success, not housing estates and congested roads). Policy E5 is incompatible with the high housing numbers proposed.

Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This disregards the responses from the 2014 public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1715  Respondent: 10933793 / Julia Tilbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/”Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford's river landscape less off-putting and support town-break packages for high-value To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An "English town break" (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to RHS Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in
London) would be highly attractive to many European visitors who currently by pass Guildford to go to Bath, Oxford or Cambridge instead.

1. To rule out the redevelopment of scarce rural hotel sites (e. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan, yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1716  Respondent: 10933793 / Julia Tilbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E7 Guildford Town Centre

I OBJECT. The policy "vision" refers to protecting the Guildford's "unique setting" (including, surely, its surrounding Green Belt and countryside views) but this is not carried over into the formal policy wording in the blue box. It is therefore a worthless commitment.

There should be much more residential use of the town centre where most people, especially the young and less well-off, want to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose a visionary regeneration plan for the River Way/Walnut Tree Close area, where there is arguably enough brownfield land for 4,000 new homes, meeting near all the borough's housing need over the plan period without harming the countryside. There is an urgent need for a brownfield register and to focus on brownfield redevelopment before considering development outside the existing urban area. CIL strategy must promote brownfield redevelopment.

Strangely, the policy does not address any of the major issues raised by the Council's own Town Centre Master Plan, the Guildford Vision Group's proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public debate.

This policy also fails to provide guidance on design requirements, as required by the NPPF.11

Instead, it is far too concerned with shopping. Town-centre shopping is in decline internationally as consumers move irreversibly online. There is no need to expand physical retail capacity or warehousing floorspace, which will only kill off existing shops while using up valuable housing land. The delays to the redevelopment of North Street is a flashing red light warning that consumer patterns are shifting. Guildford is a large town without a single butcher or fishmonger, showing that the Council need to use the fiscal and other mechanisms at its disposal to support niche retailers. To opt for large, impersonal department stores and dull high-street chain stores at the expense of Guildford's unique character would be an historic blunder. For this type of shopping, most residents can go to Woking or Kingston, whose ugly town centres should serve as a dire warning to Guildford planners.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1717  Respondent: 10933793 / Julia Tilbury  Agent:
POLICY E8 - District centres

I OBJECT to the proposal that sites "on the edge" of District Centres should be considered for retail developments. This is another Trojan horse policy, allowing retail hubs to be vastly expanded in order to smooth the way for vast new housing estates outside in the countryside (e.g. to meet the "everyday shopping and service needs" of the roughly 1,500 people living in the 600 new homes planned for the Horsleys).

This is a case of back-to-front priorities. Expanded local retail hubs are being proposed in order to justify more housebuilding in the villages, and in a forlorn attempt to mitigate the serious traffic and infrastructure problems this will bring. The Council have no business preparing the way for new supermarkets in the Green Belt. Rural retail capacity should be left to local demand.

The policy proposes not a single measure to support existing rural shops and services that are the lifeblood of village communities, e.g. using business rates and other levers at the Council's disposal.

"11 NPPF 59: "Local planning authorities should consider ... the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1718  Respondent: 10933793 / Julia Tilbury  Agent:

POLICY E9 - Local centres

I OBJECT (for the reasons given under Policy E8 above) to the proposal for retail development adjacent to the 6 rural centres, and sites on the edge of designated centres. This is creeping urbanisation, damaging to the Green Belt and to Guildford town revival as a thriving urban hub. It will contribute to local urban decay and depopulation, just as expansion of the suburbs did to mid-20th century London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1702  Respondent: 10933793 / Julia Tilbury  Agent:
**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY H1 -Homes for all**

I OBJECT. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to de-humanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

"5 This has been challenged by residents including, by Mr Ben as far as the Information Ombudsman. But the Council have consistently refused to seek disclosure of the model.

"6 See [http://www.glheam.com/developer/Pages/Overview.aspx](http://www.glheam.com/developer/Pages/Overview.aspx) : ·we act for many of the leading developers." G L Hearn is now part of Capita Real Estate.

"7 See letter from Neil Taylor, Director of Development at Guildford Borough Council, in the Surrey Advertiser of 3 June 2016: "I would like to highlight the difference between the Objectively Assessed Housing Need (OAN) figure produced by G L Hearn (693 homes per year) and the Housing Target for the Local Plan. Some opponents of the Local Plan appear to blur the edges of the two figures. The OAN figure is the one produced by the modelling tool. The Housing Target figure is the proportion of the OAN that the Council feels it can successfully deliver. Based on the infrastructure that Highways England, Surrey County Council and others suggest they can provide over the next 15 years, the Council believes it can deliver the full OAN number as the Housing Target. However if, during this consultation, or later on, the anticipated infrastructure is not going to be provided then the council will be forced to apply further constraints to the OAN number, which may reduce the Housing Target number. Therefore, it is clear that the OAN and the Housing Target are not the same. The OAN is objective and the Housing Target is subject to constraints."

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Over provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
**Comment ID:** PSLPP16/1703  **Respondent:** 10933793 / Julia Tilbury  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**POLICY H2- Affordable homes**

I OBJECT. "Affordable" homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people's means and that starter homes will not become available for local people.

In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

I question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally (contradicting the Government's policy of encouraging labour mobility and development in poorer regions, where homes are cheaper anyway); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes will be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and by the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed in the plan might influence the market in a more remote part of the UK, but not here.

This policy's version of "affordability" is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/1704  **Respondent:** 10933793 / Julia Tilbury  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**POLICY H3- Rural Exception Homes**

I OBJECT. This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the "mix", this can include
"market" housing - i.e. normal commercial development which in Guildford usually means large executive homes. This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances."

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/1723  **Respondent:** 10933793 / Julia Tilbury  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**POLICY I1 - Infrastructure and delivery**

I OBJECT. Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. Yet this plan's commitment to building housing estates across the Guildford countryside will mean either major infrastructure investment that no-one is prepared to pay for or else a catastrophic and simultaneous collapse in transport, educational, medical, energy, water and communications services.

The plan targets greenfield sites - requiring heavy infrastructure investment - in order to generate CIL income necessary to meet an infrastructure shortfall that is already serious. This is not sensible. The current draft CIL scale also encourages development on greenfield sites rather than brownfield.

The policy wording says nothing about roads and traffic. The Council's methodology for assessing infrastructure needs in this area is inadequate, identifying only the tip of an iceberg of existing congestion. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that involve demolishing property and road-widening in residential areas to solve the resultant congestion. The A3 improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place. These detailed investigations are being deferred until the planning application stage and will be left to developers to prepare. If a site then proves to be unsustainable its Green Belt protection will have been lost for no reason and unsuitable development will take place by a more insidious process.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy 11. By prioritising greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough's infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council's control and on the vagaries of CIL income. Instead of recognising this as a key issue, the plan is based on a wing and a prayer.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
POLICY I2 - Supporting the Department of Transport's "Road Investment Strategy"

I OBJECT. This policy is too vague and optimistic. Decisions by Highways England on improving the strategic road network (the M25 and A3) are still years off. The Council have suggested a very expensive tunnel under Guildford, but this is no more than a dream. Even if Highways England accepted this (which is highly unlikely in the post-Brexit public spending climate) it would not be built until the end of the plan period at the earliest. Other, less expensive A3 improvements, and changes to the Junction 10/Heathrow stretch of the M25, will also take years to agree and complete.

The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is foolhardy. Surrey is the most congested county in England, with 683 people per square kilometre, compared with an English average of 413. This policy will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone). This is a major development constraint that should have been applied to the OAN before this consultation, and not left up in the air.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

POLICY I3 - Sustainable transport for new developments

I OBJECT. This is another vaguely aspirational policy, based on wishful thinking and not grounded in the practical realities of daily life. It consists of a standard, box-ticking list of local government measures unrelated to the specifics of the plan. Like infrastructure, transport appears to be an afterthought; the policy fails in its essential job of guiding planning decisions, since it assumes development of any kind can be supported by sustainable transport.

The sustainability of the dormitory settlements which the Council want built across the countryside depends on a general "modal shift" from private car use to walking, cycling and public transport. This is unrealistic. The proposed sites are
often miles away from the nearest railway station. Bus services even in the largest villages are almost non-existent—just one bus to and from Guildford each day in the Horsleys and none at weekends. Since bus services depend on profitability, they cannot be expanded and the Council are not proposing to subsidise new ones. Rural buses are too slow anyway for busy people. Most rural roads in the borough are narrow, winding, hilly, potholed, muddy and unlit. Many flood badly and have no footpaths.

The desired modal shift would require a comprehensive co-ordination of bus and train timetables with services every few minutes, seven days a week, to stops within walking distance of every home in the borough. This kind of integrated public transport system has been achieved in Switzerland, for instance, but only at huge public cost and thanks to a political consensus supporting state ownership of trains, buses and the post office, which delivers rural passengers as well as mail. There is absolutely no chance of this in the UK.

The vast majority of the borough's residents are not, in practice, able to cycle. This includes children, the elderly, commuters who have to look smart, the infirm, the unfit and people carrying goods or shopping of any kind. Dependence on walking and cycling discriminates against these groups, which include some of the most vulnerable members of the community. It is socially unjust.

One in two working people in Guildford commute for up to 3 hours a day, as I used to do. They will not leave their cars for even part of their journey if it means longer travel times.

Park-and-rides are a welcome part of the transport mix but are too slow for commuters and others on a tight schedule. Well-off pensioners seem to be the main beneficiaries. For an adult couple going shopping it is still cheaper to park in town.

Forget about water buses. The Wey is too narrow and, with a river speed limit of 4mph, boats are too slow for anything but recreation. Except on the tideway, not even the Thames has such services.

The addition of two new stations appears attractive but will slow down train journeys, which are already slower than at any time since the 1930s. Knock-on effects on localities where the new stations are built have not been worked out or presented.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/1726 **Respondent:** 10933793 / Julia Tilbury **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY 14 Green and blue infrastructure

I OBJECT. This policy is a box-ticking exercise with no teeth to it. It sits oddly with the plan's onslaught on the Green Belt. The plan to build on large areas of countryside and to inset villages will cancel out any benefits from extending the principle of enhancing biodiversity beyond Biodiversity Opportunity Areas.

There is no mention of the value of wildlife gardening to biodiversity or the important role that larger gardens play in a village setting.
There is no mention of the impact of the plan on food production, or monitoring the loss of agricultural land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1705  Respondent: 10933793 / Julia Tilbury  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P1 - Surrey Hills Area of Outstanding Natural Beauty

I OBJECT. This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1706  Respondent: 10933793 / Julia Tilbury  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P2 - Green Belt

I OBJECT. This policy states, "the general extent of the Green Belt has been retained." This is a lie.

The policy wording is tepid in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government's policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations - an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. It is an inalienable public good. Once gone it is gone forever. It is not the Council's to give away.

Policy P2 omits any assessment of the Green Belt's value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:
• Agricultural production
• Rural leisure and tourism amenities
• Water catchment
• Flood control
• Biodiversity
• Natural heritage
• A carbon sink for air pollution
• Room for public facilities such as parks and burial grounds
• Profitable film locations (e.g. Shere)
• Future economic potential such as mineral extraction (even tracking)
• Natural beauty, landmarks, open space, rural views and sight lines
• Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)6

As a matter of law, morality and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations.

It is disreputable to argue, as the Council do, that the plan would involve the loss of "only" 1.6% of the borough's Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no "acceptable" percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.

I am not opposed to appropriate development in the Green Belt and recently supported a major planning application in my own village. But I fail to see why a system of fair burden-sharing of new development cannot be applied to the borough's existing settlements in proportion to their size. This alternative would minimise the strain on infrastructure and maximise the chances of retaining the character of each settlement through gradual growth. It is reasonable to ask urban Guildford, with $x$ times the population of semi-rural East Horsley for instance, to accommodate $x$ times the number of new homes over the plan period. Parish councils could be asked, and will no doubt be willing, to propose where their quota of houses should go. Most rural residents are reasonable people who, if not alienated by top-down planners, will support realistic numbers of new houses in their neighbourhoods. Unfortunately, this democratic, bottom-up approach has not been attempted.

Instead, while developers flip and land-bank urban sites as a financial speculation, this plan will dump most new development on greenfield sites where building costs are lower, covering the Green Belt with dozens of housing estates that few residents want. 8,086 new houses are planned for the Green Belt but only 1,135 for Guildford urban area. This is disruptive, socially inequitable and unnecessary. It will not only destroy countryside but will also delay and disincentivise much-needed urban regeneration. The remarkable revival and repopulation of central London shows that building dormitory satellite settlements is an out-of-date approach to planning.

I particularly protest at the "insetting" of 14 villages from the Green Belt, and at "infilling" 12 of the borough's Green Belt villages. I am deeply disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are "leggy" in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the "openness" of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF's other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hellbent on self-defeat.

I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors.9 To "inset" two-thirds of the borough's rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough's location on the edge of Metropolitan London. I
"8 See Ministerial foreword: "Our natural environment is essential to our wellbeing, and it can be better looked after than it has Habitats that have been degraded can be restored. Species that have been isolated can be reconnected. Green Belt land that has been depleted of diversity can be refilled by nature—and opened to people to experience it, to the benefit of body and soul."

"9 Councillor Matthew Sarti, Planning Committee meeting, 18 May 2016.

cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed "insetting" and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need (especially post-Brexit) and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17's aim of "empowering local people to shape their surroundings" and other NPPF provisions."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1727 Respondent: 10933793 / Julia Tilbury Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

SITES

1. Green Belt sites

I OBJECT to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that "allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses." This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. This amounts to a war of attrition by the Council in conjunction with developers, since many busy residents are sick and tired of repeating the same comments to deaf ears. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014.13 Some residents have concluded that commenting is a waste of time.

"13 Further discredited by criminality on the Council. Former lead Councillor for planning Monkia Juneja, architect of the 2014 draft plan, is currently serving a two-year sentence on 3 counts of forgery, pretending to be a barrister and obtaining dishonest pecuniary advantage.

All Green Belt sites should be removed from the plan until "exceptional circumstances" for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1707 Respondent: 10933793 / Julia Tilbury Agent:
POLICY P3 - Countryside (i.e. beyond the Green Belt)

I OBJECT. This is more protective - as a policy- than the proposals for the AONB and the Green Belt, so is anomalous and wrong. I am not in favour of building on this area, since urban, brownfield areas are sufficient to meet all reasonable housing targets. There is no need to build on any green fields if brownfield, previously developed land is used efficiently (without garden-grabbing).

This policy refers to the countryside near Ash and Tongham (see paragraph 4.3.28). This area does not justify stronger policy protection than any other part of the borough. The fact that the current and previous Council Leaders represent it should not give it preferential status: "we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location". Green Belt and AONB areas should by definition have higher levels of protection than non-Green Belt areas.

It should also be noted that Ash and Tongham lie beyond Guildford far away from London and therefore make no contribution to controlling Metropolitan urban sprawl, unlike those villages which, ironically, are to be "inset". That is presumably why Ash and Tongham are not in the Green Belt already. This policy, however, attaches higher priority to preventing the "coalescence between the Ash and Tongham urban area and Aldershot" than it does to the primary purpose of the Metropolitan Green Belt, which is to stop London sprawl.

Apart from being a scandalous misuse of local political patronage, this policy effectively says, "Look, we are not destroying the Guildford Green Belt because we are extending it in Ash and Tongham." It is a cynical piece of tokenism. The leader of the Council needs to be seen to be above reproach by deleting this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1708  Respondent: 10933793 / Julia Tilbury  Agent:

POLICY P4 - Flood risk and water source protection zones

I OBJECT. Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the
town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1709  Respondent: 10933793 / Julia Tilbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P5 - Thames Basin Heath Special Protection Areas

I OBJECT. This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small as to be meaningless.

SANG (Suitable Alternative Natural Greenspace) is not beneficial since the sites identified or targeted are already green space. This is just using agricultural or wooded land as recreation land in order to justify building on other green spaces nearby. There is no actual increase in open space or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas. SANG- in part used to prevent dogs and cats attacking nesting birds - must also ensure that it is not using land which is adjacent to the Special Protection Areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1700  Respondent: 10933793 / Julia Tilbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY S1 - Presumption in favour of sustainable development

I OBJECT. The NPPF states that the presumption in favour of sustainable development "should be seen as a golden thread running through both plan-making and decision-taking." Standing at the head of the draft plan, Policy S1 ought to set a clear framework. Instead, no definition of "sustainable development" is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.
The promise "to secure development that secures the economic, social and environmental conditions in the area" omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is useless. Under this policy, any development will qualify as "sustainable", thereby failing to apply the NPPF's most important guideline.

The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan's contempt for Green Belt constraints is amply demonstrated in later policies.

The commitment to approve planning applications "wherever possible" and "without delay" reveals this draft plan's pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17. In my view Policy S1 is a non-policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1701  Respondent: 10933793 / Julia Tilbury  Agent:  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY S2 -Borough Wide Strategy

I OBJECT. I have 5 objections to the proposal to build 13,860 new homes:

1. The number is based on pre-Brexit projections for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously."4

2. The number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, "West Surrey" is much too Half of Guildford borough's residents work elsewhere, and half the people who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent districts of Rushmoor and Mole Valley, minutes from Guildford town, are outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere. Unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and is part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council have failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so the housing numbers...
"1 NPPF paragraph

"2 The most widely accepted definition is the 1987 United Nations one from the Brundtland Report: "Development that meets the needs of the present without compromising the ability of future generations to meet their own needs."

"3 Including: "empowering local people to shape their surroundings... Take account of the different roles and character of different areas... protecting the Green Belts around them... recognizing the intrinsic character and beauty of the countryside and supporting thriving communities within it... Support to conserving and enhancing the natural environment and reducing pollution... Encourage the effective use of land by reusing land that has previously been developed (brownfield land)... Conserve heritage assets... Actively manage patterns of growth to make the fullest use of public transport and cycling and focus significant development on locations which can be made sustainable."

"4 At the time of writing, about £8billion (40%) has been wiped off the value of the UK's top 4 housebuilders alone.

derived from it are unreliable. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county (none in Mole Valley, for instance}. This highly lopsided distribution is unexplained.

1. The figure of 13,860 new homes is It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA.5 The Council say we should trust the contractors' model because it is used by a large number of other local authorities. Wide usage, however, does not confer objectivity. Guildford's OAN would fail the basic transparency test even if the methodology used were a universally admired 'gold standard'. But it is not: it belongs to consultants whose website openly proclaim their pro-development agenda,6 provoking reasonable suspicion that the figures are inflated. External experts and members of the public have provided detailed critiques of the model. Its most fatal flaw, however, is that it has not been disclosed- not even to the authors of the plan, who have taken it on trust. This is irrational and unsound.

1. The status of the 13,860 figure is The plan fails to set a Housing Target of new homes to be built, or explain how this relates to the "Objectively Assessed Number" (OAN) for housing need. Elsewhere, the Council have said that the two are identical because the OAN is "deliverable" and is by definition objective and cannot be contradicted, but in the same breath say that infrastructure or other constraints may in due course affect deliverability.7 Despite the NPPF, the plan fails to address these constraints. In any case, the number of homes proposed, plus existing planning permission, plus expected "windfall" sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how can anything else be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a "plan" that fails to propose a Housing Target that takes normal constraints and adjustments credibly into account, and which leaves the Council to set one at any level without further consultation. Even if the OAN were not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

1. It is irrational to embark on a radical transformation of the borough without a clear Housing Most of Guildford borough is theoretically protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the existing number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. Sites in East and West Horsley

I OBJECT in particular to including Sites A36-41 (East and West Horsley). This is a back-door way to create a mega-village essentially, a soulless new dormitory town. The Horsleys feel victimised by this plan, which has been masterminded by Council leaders representing Ash and Tongham at the other end of the borough, where (in a flagrant case of political double standards) the Green Belt is actually being extended under Policy P3.15

Whatever their merits as development sites, the 6 Horsley sites should not be considered individually but for their cumulative impact on the contiguous villages of East and West Horsley.

Building 533 new houses on these 6 sites, plus at least another 90 on small sites is (a) excessive in absolute terms and (b) disproportionate relative to the rest of the borough. It will destroy the rural character of these communities.18

Under the plan, rural West Horsley will take 35% of new homes, urban Ash and Tongham 16% and Guildford urban area only 11%. The total number of homes in West Horsley will increase by 35%, which is disproportionate when measured against the overall increase in housing across the borough and particularly in Guildford town. If the Council have justifiable reasons to transform a particular community so radically, the plan should present a case rather than putting forward site proposals as a fait accompli.

These sites will put unsustainable strain on local facilities and infrastructure, including public transport, parking, schooling, medical facilities, sewage, surface drainage and shops. For instance:

- Thames Water have advised the Council that the current wastewater network will not cope and that the foul drainage system all the way to the treatment works North of Ripley will need to be upgraded.
- Guildford Council's Education Review says "expansion options may need to be considered for primary" education in the Horsley area within the first 5 years of the plan, but Surrey County Council have no plans to do so. The Raleigh School is already full. The private Glenesk and Cranmore schools are also at or near to full capacity. The suggestion that schools in Ripley can be used contradicts the plan's stated intention to reduce traffic on the A3 and strategic aim that primary schools should be within walking distance.
- The plan's Infrastructure Schedule (Appendix C) imagines an "East Horsley and West Horsley traffic management and environmental improvement scheme between 2019 and 2023 by Surrey CC" but gives no details. This scheme is just wishful thinking. The proposed housing can only harm the local environment, not "improve" it.

The harmful impact of these sites is magnified by the proximity of the so-called Wisley Airfield site (Three Farms Meadow), with over 2,000 new homes only 2 miles away (see below).

The density of new housing on the 6 Horsley sites is inappropriate, being greater than anywhere in the locality at present.

Sites situated on the periphery of existing development in the Horsleys encroach on surrounding open fields and require the extension of settlement boundaries for which the plan presents no arguments. Contrary to NPPF paragraph 79, this will contribute to creeping urbanisation by attenuating the Green Belt corridors separating the Horsleys from neighbouring settlements.
Collectively, these 6 sites militate against NPPF paragraph 81's encouragement of access to the Green Belt and its amenity and recreation value. This has been a success story in the Horsleys, with the creation of an amenity wood and community garden, the purchase of adjacent fields (on the eastern side of Ockham Road North) by local residents in order to preserve their open aspect, well-maintained pitches for local football and cricket clubs, public tennis courts, open space for a high-quality campsite (at Waterloo Farm) used by many foreign tourists and the approval of plans for a "Theatre in the Woods"-making West Horsley the only village in Surrey with an opera house. The open nature of West Horsley determined that a long portion of the 2012 Olympic cycle races passed through the village. This route has since been adopted by cyclists as a permanent asset, including the annual

"14 E.g. E. Gallagher Homes v Solihull Metropolitan Borough Council [2014] EWHC 1283

"15 Councillor Paul Spooner and his predecessor, Councillor Stephen Mansbridge.

"16 Even some property developers complain about the Council's bias in favour of oversized developments, g. Dandara, whose relatively small Green Belt sites on the A246 (Epsom Road) in West Horsley is not considered in the plan.

Prudential cycle race. These and future examples of "positive planning" depend on protecting the Green Belt to maintain the openness and attractiveness of the local landscape and avoiding the urbanisation and traffic congestion that Sites A36-41 will bring.

By surrounding Waterloo Farm campsite with 120 new houses, Policy A40 on land to the North of West Horsley will make this rural tourism amenity unviable. This may accord with developers' plans, since the site would then be vulnerable to infilling with yet more housing.

Site A40 is subject to an unacceptable flood risk from a combination of a high groundwater table and the lack of surface water run-off. This is flat, clay land on the downhill side of the Horsleys where floodwater from new development will accumulate and back up onto existing properties nearby. I can provide photographs proving how badly these fields already flood at present. These problems will only get worse with the increase in extreme weather events associated with climate change. The "appropriate mitigation" suggested in Policy A40 exists only as an abstract notion. It should not overrule the need for Green Belt "exceptional circumstances".

Policy A40 underestimates the problems of safe access and egress. Firstly, Ockham Road North was closed for several weeks in 2014 because of flooding, and still floods regularly. Secondly, access problems are not confined to flooding and are not addressed by the proposal to extend the existing 30mph zone past the site entrance. Repeated attempts made by Ockham Road North residents to extend this zone have been turned down by the local authorities, Highways England and Surrey Police, even though data collected in 2015 show that traffic has doubled over the last 15 years and that the average speed in the 40mph section of this road is 52mph, with maximum recorded speeds of over 80mph. No traffic calming measures have so far been achieved. Additional housing will add to several hazards along this stretch of road, including:

- Its use by pedestrians, especially children (using the Raleigh and Glensk schools and catching school buses to Guildford and Howard of Effingham), pensioners living in the string of bungalows at the northern end of the road, and visitors from the Waterloo campsite who are unfamiliar with the area.
- The existence of a narrow footpath on only one side of the road in any one spot. The layout means that walking half a mile between Green Land and East Lane requires crossing the road twice.
- The road's increasing use by recreational cyclists (see above).
- Its winding nature, poor sight lines (especially when interrupted by summer vegetation) and dangerous, concealed driveways. Most of these were built in the 1930s. Some have been widened but many are too narrow for modern traffic. Since a deep ditch runs along most of the road, vehicles have to swing out dangerously when entering or leaving.
- The prospect of additional traffic, including 19,000 HGV movements (90 a day over a long period) if Surrey County Council approves the Drift Golf Course's planning application to re-landscape its site using bulk waste transported from London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **Three Farms Meadow site**

I OBJECT also to there-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision - a clear signal to the developers to try again.

This is not an NPPF "presumption in favour of sustainable development" but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected. Residents are disturbed by apparent political links between the ruling Conservative group on the Council and individuals connected to the developers, a shadowy Cayman Islands company. 18

Policy A35 should be ditched from the plan for all the reasons the development was rejected by the Planning Committee, including:

- Green Belt location and absence of "exceptional circumstances".
- Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.
- Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).
- Proximity to A3/M25 bottleneck and Ripley village and roundabouts.

"17 Application reference 15/P/00012.

"18 Including the Rt Han. David Mellor QC (its erstwhile founder and former Minister), Mr Michael Murray (spokesman for the project and Conservative cabinet member for planning policy at the Vale of the White Horse District Council in Oxfordshire) and the Hon. Charles Balfour (director, descendant of the Tory Prime Minister).

- Absence of adequate traffic data.
- Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.
- Loss of high-quality agricultural land (55% of the site), in breach of national policy.
- Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.
- Presence of a Surrey County Council safeguarded waste site.
- Cost of infrastructure required to the detriment of alternative more favourable sites.
- Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.
- Impact on listed buildings.
- Difficulty of SANG siting and inability to divert residents and their pets away from the SPA. Extreme housing density with tiny garden spaces.
- Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.
• Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).19
• Failure to evaluate the cumulative impact of this and nearby development sites on the area.

19" The River Mole would flood even more badly should a new runway be built at Gatwick.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1691  Respondent: 10933857 / C J Tilbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D1 -Making better places

I OBJECT to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force.

The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1692  Respondent: 10933857 / C J Tilbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY D2 - Sustainable design, construction and energy

I OBJECT. Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, "like a golden thread". It should be set out clearly in Policy 51, not buried away as a minor detail in Policy 02.

This policy amounts to "greenwashing", expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. This policy should not be just about saving energy but about preserving the borough's stock of natural capital, especially the countryside, from futile attempts to rig the housing market.

This policy's emphasis on Combined Cooling Heating and Power and communal heating networks is meaningless, since no such networks are available locally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1693  Respondent: 10933857 / C J Tilbury  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ) , is Sound? ( ) , is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D3 - Historic environment

I OBJECT. This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to "support development" that might "enhance" heritage assets leaves wide scope for abuse in the form of destructive commercialisation and financial leveraging of relevant sites.

This policy is based on the false premise that Guildford's heritage is inherently in decay. This is a developer's charter-a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council's aggressive reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the "reasoned justification", the actual policy wording in the blue box leaves too many loopholes.

Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1694  Respondent: 10933857 / C J Tilbury  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D4- Development in urban areas and inset villages

I OBJECT. This is a piously aspirational policy that does not address any of the obvious practical issues already touched on above:

- The plan envisages that 40% of homes built will be "affordable", but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called "affordable" homes or pay an "affordable". There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand). The number of homes planned in the urban area is too low. There is a glaring need for regeneration in many urban areas, but this is ignored in favour building homes on green-field sites instead. This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure.

The plan envisages a large expansion of the traditional "bricks and mortar" retail sector, but this is a sector in rapid and continuous decline. All the stated policy aims for "inset" villages will be negated by the excessive weight of new housing development proposed which would radically change their character forever. Against this disruptive background, it is barely relevant to talk about preserving views!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E1 - Meeting employment needs

I OBJECT because -

The evidence base is unreliable;

There is unclear differentiation between B class uses;

Only high value-added business uses, contributing to a modern "knowledge economy", are desirable, not low-grade, low-employment warehousing which is also land hungry;

Industrial and commercial businesses must be concentrated in the urban area or existing business parks (e.g. Slyfield) not in the rural environment which the infrastructure is unable to support;
"10 See footnote 3 above.

The rural environment must support micro- or high-tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY E4- Surrey Research Park

I OBJECT. The Council are required by the NPPF to facilitate commercial science and technology clusters. But, as with Policies H1 and E2 above, this policy seems to be dictated more by the ambitions of Surrey University than the public interest. In an extremely tangled sentence, it says that the Research Park will be "protected for business use... in any science... that is complementary to the activities of the University of Surrey."

This fails to distinguish adequately between the University's public role as a state-funded, academic institution and its private, financial interest in profit-making business spin-offs. It ignores enterprises that might be commercial rivals of the University. And it fails to consider the public harm done by turning the Research Park into a larger Business Park, such as the loss of Green Belt social and environmental capital.

B1b should be the primary use class for the Research Park and applications for B1a should be resisted given the danger of diluting the core purpose and reputation of the park. The inclusion of B1c uses is inappropriate and unnecessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

POLICY E5 - Rural economy

I OBJECT. Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism that require local people to be consulted and heeded, not ignored. Villages need protecting in terms of both design and scale.

Most of the economic activities listed in 4.4.44 depend on maintaining the rural character of our villages which would be endangered by the wholesale "inserting", boundary expansion and house building proposed in other parts of the plan. This applies also to new and projected enterprises in the Green Belt (e.g. Grange Park Opera's Theatre in the Woods in West Horsley, which requires a protected, rustic setting to be a success, not housing estates and congested roads). Policy E5 is incompatible with the high housing numbers proposed.

Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This disregards the responses from the 2014 public consultation.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/1687  **Respondent:** 10933857 / C J Tilbury  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**POLICY E6- The leisure and visitor experience**

I OBJECT. Tourism and visitors do not depend on new visitor "attractions" and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/"Disneyfication". Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many "leisure and visitor attractions" already. The case for creating more is not made and no examples are given. Instead, the plan's explicit priorities should be:

1. To protect the borough's prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford's river landscape less off-putting and support town-break packages for high-value To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

2. To help private providers market local This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An "English town break" (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to RHS Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by pass Guildford to go to Bath, Oxford or Cambridge instead.

3. To rule out the redevelopment of scarce rural hotel sites (e. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan, yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/1688  **Respondent:** 10933857 / C J Tilbury  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OLICY E7 Guildford Town Centre

I OBJECT . The policy "vision" refers to protecting the Guildford's "unique setting" (including, surely, its surrounding Green Belt and countryside views) but this is not carried over into the formal policy wording in the blue box. It is therefore a worthless commitment.

There should be much more residential use of the town centre where most people, especially the young and less well-off, want to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose a visionary regeneration plan for the River Way/Walnut Tree Close area, where there is arguably enough brownfield land for 4,000 new homes, meeting near all the borough's housing need over the plan period without harming the countryside . There is an urgent need for a brownfield register and to focus on brownfield redevelopment before considering development outside the existing urban area. CIL strategy must promote brownfield redevelopment.

Strangely, the policy does not address any of the major issues raised by the Council's own Town Centre Master Plan, the Guildford Vision Group's proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public debate.

This policy also fails to provide guidance on design requirements, as required by the NPPF.11

Instead, it is far too concerned with shopping. Town-centre shopping is in decline internationally as consumers move irreversibly online. There is no need to expand physical retail capacity or warehousing floorspace, which will only kill off existing shops while using up valuable housing land. The delays to the redevelopment of North Street is a flashing red light warning that consumer patterns are shifting. Guildford is a large town without a single butcher or fishmonger, showing that the Council need to use the fiscal and other mechanisms at its disposal to support niche retailers. To opt for large, impersonal department stores and dull high-street chain stores at the expense of Guildford's unique character would be an historic blunder. For this type of shopping, most residents can go to Woking or Kingston, whose ugly town centres should serve as a dire warning to Guildford planners.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1689  Respondent: 10933857 / C J Tilbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY E8- District centres

I OBJECT to the proposal that sites "on the edge" of District Centres should be considered for retail developments. This is another Trojan horse policy, allowing retail hubs to be vastly expanded in order to smooth the way for vast new housing estates outside in the countryside (e.g. to meet the "everyday shopping and service needs" of the roughly 1,500 people living in the 600 new homes planned for the Horsleys).

This is a case of back-to-front priorities. Expanded local retail hubs are being proposed in order to justify more housebuilding in the villages, and in a forlorn attempt to mitigate the serious traffic and infrastructure problems this will bring. The Council have no business preparing the way for new supermarkets in the Green Belt. Rural retail capacity should be left to local demand.

The policy proposes not a single measure to support existing rural shops and services that are the lifeblood of village communities, e.g. using business rates and other levers at the Council's disposal.

"11 NPPF 59: ""Local planning authorities should consider … the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/1690 | Respondent: 10933857 / C J Tilbury | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

POLICY E9 - Local centres

I OBJECT (for the reasons given under Policy E8 above) to the proposal for retail development adjacent to the 6 rural centres, and sites on the edge of designated centres. This is creeping urbanisation, damaging to the Green Belt and to Guildford town revival as a thriving urban hub. It will contribute to local urban decay and depopulation, just as expansion of the suburbs did to mid-20th century London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/1674 | Respondent: 10933857 / C J Tilbury | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
POLICY H1 - Homes for all

I OBJECT. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to de-humanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

"5 This has been challenged by residents including, by Mr Ben as far as the Information Ombudsman. But the Council have consistently refused to seek disclosure of the model.

"6 See http://www.glheam.com/developer/Pages/Overview.aspx : ·we act for many of the leading developers." G L Hearn is now part of Capita Real Estate.

"7 See letter from Neil Taylor, Director of Development at Guildford Borough Council, in the Surrey Advertiser of 3 June 2016: "I would like to highlight the difference between the Objectively Assessed Housing Need (OAN) figure produced by G L Hearn (693 homes per year) and the Housing Target for the Local Plan. Some opponents of the Local Plan appear to blur the edges of the two figures. The OAN figure is the one produced by the modelling tool. The Housing Target figure is the proportion of the OAN that the Council feels it can successfully deliver. Based on the infrastructure that Highways England, Surrey County Council and others suggest they can provide over the next 15 years, the Council believes it can deliver the full OAN number as the Housing Target. However if, during this consultation, or later on, the anticipated infrastructure is not going to be provided then the council will be forced to apply further constraints to the OAN number, which may reduce the Housing Target number. Therefore, it is clear that the OAN and the Housing Target are not the same. The OAN is objective and the Housing Target is subject to constraints.”

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Over provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H2- Affordable homes

I OBJECT. "Affordable" homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people's means and that starter homes will not become available for local people.

In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

I question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally (contradicting the Government's policy of encouraging labour mobility and development in poorer regions, where homes are cheaper anyway); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes will be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and by the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed in the plan might influence the market in a more remote part of the UK, but not here.

This policy's version of "affordability" is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1676  Respondent: 10933857 / C J Tilbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H3- Rural Exception Homes

I OBJECT. This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the "mix", this can include "market" housing - i.e. normal commercial development which in Guildford usually means large executive homes. This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances."
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY 11 - Infrastructure and delivery

I OBJECT . Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. Yet this plan's commitment to building housing estates across the Guildford countryside will mean either major infrastructure investment that no-one is prepared to pay for or else a catastrophic and simultaneous collapse in transport, educational, medical, energy, water and communications services.

The plan targets greenfield sites—requiring heavy infrastructure investment—in order to generate CIL income necessary to meet an infrastructure shortfall that is already serious. This is not sensible. The current draft CIL scale also encourages development on greenfield sites rather than brownfield.

The policy wording says nothing about roads and traffic. The Council's methodology for assessing infrastructure needs in this area is inadequate, identifying only the tip of an iceberg of existing congestion. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that involve demolishing property and road-widening in residential areas to solve the resultant congestion. The A3 improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place. These detailed investigations are being deferred until the planning application stage and will be left to developers to prepare. If a site then proves to be unsustainable its Green Belt protection will have been lost for no reason and unsuitable development will take place by a more insidious process.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy 11. By prioritising greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough's infrastructure capacity for sustainable development, and then tailor development accordingly. "12 This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council's control and on the vagaries of CIL income. Instead of recognising this as a key issue, the plan is based on a wing and a prayer.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY I2 - Supporting the Department of Transport's "Road Investment Strategy"

I OBJECT. This policy is too vague and optimistic. Decisions by Highways England on improving the strategic road network (the M25 and A3) are still years off. The Council have suggested a very expensive tunnel under Guildford, but this is no more than a dream. Even if Highways England accepted this (which is highly unlikely in the post-Brexit public spending climate) it would not be built until the end of the plan period at the earliest. Other, less expensive A3 improvements, and changes to the Junction 10/Heathrow stretch of the M25, will also take years to agree and complete.

The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is foolhardy. Surrey is the most congested county in England, with 683 people per square kilometre, compared with an English average of 413. This policy will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone). This is a major development constraint that should have been applied to the OAN before this consultation, and not left up in the air.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1697  Respondent: 10933857 / C J Tilbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY I3 - Sustainable transport for new developments

I OBJECT. This is another vaguely aspirational policy, based on wishful thinking and not grounded in the practical realities of daily life. It consists of a standard, box-ticking list of local government measures unrelated to the specifics of the plan. Like infrastructure, transport appears to be an afterthought; the policy fails in its essential job of guiding planning decisions, since it assumes development of any kind can be supported by sustainable transport.

"12 Residents have been incredulous at the Council's failure to apply infrastructure constraints to housing numbers, in response first to the 2013 Issues and Options paper and then to the 2014 draft local plan. There were 20,000 responses each time.

The sustainability of the dormitory settlements which the Council want built across the countryside depends on a general "modal shift" from private car use to walking, cycling and public transport. This is unrealistic. The proposed sites are often miles away from the nearest railway station. Bus services even in the largest villages are almost non-existent- just
one bus to and from Guildford each day in the Horsleys and none at weekends. Since bus services depend on profitability, they cannot be expanded and the Council are not proposing to subsidise new ones. Rural buses are too slow anyway for busy people. Most rural roads in the borough are narrow, winding, hilly, potholed, muddy and unlit. Many flood badly and have no footpaths.

The desired modal shift would require a comprehensive co-ordination of bus and train timetables with services every few minutes, seven days a week, to stops within walking distance of every home in the borough. This kind of integrated public transport system has been achieved in Switzerland, for instance, but only at huge public cost and thanks to a political consensus supporting state ownership of trains, buses and the post office, which delivers rural passengers as well as mail. There is absolutely no chance of this in the UK.

The vast majority of the borough's residents are not, in practice, able to cycle. This includes children, the elderly, commuters who have to look smart, the infirm, the unfit and people carrying goods or shopping of any kind. Dependence on walking and cycling discriminates against these groups, which include some of the most vulnerable members of the community. It is socially unjust.

One in two working people in Guildford commute for up to 3 hours a day, as I used to do. They will not leave their cars for even part of their journey if it means longer travel times.

Park-and-rides are a welcome part of the transport mix but are too slow for commuters and others on a tight schedule. Well-off pensioners seem to be the main beneficiaries. For an adult couple going shopping it is still cheaper to park in town.

Forget about water buses. The Wey is too narrow and, with a river speed limit of 4mph, boats are too slow for anything but recreation. Except on the tideway, not even the Thames has such services.

The addition of two new stations appears attractive but will slow down train journeys, which are already slower than at any time since the 1930s. Knock-on effects on localities where the new stations are built have not been worked out or presented.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1698  Respondent: 10933857 / C J Tilbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY 14 Green and blue infrastructure

I OBJECT. This policy is a box-ticking exercise with no teeth to it. It sits oddly with the plan's onslaught on the Green Belt. The plan to build on large areas of countryside and to inset villages will cancel out any benefits from extending the principle of enhancing biodiversity beyond Biodiversity Opportunity Areas.

There is no mention of the value of wildlife gardening to biodiversity or the important role that larger gardens play in a village setting.

There is no mention of the impact of the plan on food production, or monitoring the loss of agricultural land.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/1677  **Respondent:** 10933857 / C J Tilbury  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY P1 - Surrey Hills Area of Outstanding Natural Beauty**

I OBJECT. This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/1678  **Respondent:** 10933857 / C J Tilbury  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY P2 - Green Belt**

I OBJECT. This policy states, "the general extent of the Green Belt has been retained." This is a lie.

The policy wording is tepid in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government's policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations - an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. It is an inalienable public good. Once gone it is gone forever. It is not the Council's to give away.

Policy P2 omits any assessment of the Green Belt's value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:
• Agricultural production
• Rural leisure and tourism amenities
• Water catchment
• Flood control
• Biodiversity
• Natural heritage
• A carbon sink for air pollution
• Room for public facilities such as parks and burial grounds
• Profitable film locations (e.g. Shere)
• Future economic potential such as mineral extraction (even tracking)
• Natural beauty, landmarks, open space, rural views and sight lines
• Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

As a matter of law, morality and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations.

It is disreputable to argue, as the Council do, that the plan would involve the loss of "only" 1.6% of the borough's Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no "acceptable" percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.

I am not opposed to appropriate development in the Green Belt and recently supported a major planning application in my own village. But I fail to see why a system of fair burden-sharing of new development cannot be applied to the borough's existing settlements in proportion to their size. This alternative would minimise the strain on infrastructure and maximise the chances of retaining the character of each settlement through gradual growth. It is reasonable to ask urban Guildford, with $x$ times the population of semi-rural East Horsley for instance, to accommodate $x$ times the number of new homes over the plan period. Parish councils could be asked, and will no doubt be willing, to propose where their quota of houses should go. Most rural residents are reasonable people who, if not alienated by top-down planners, will support realistic numbers of new houses in their neighbourhoods. Unfortunately, this democratic, bottom-up approach has not been attempted.

Instead, while developers flip and land-bank urban sites as a financial speculation, this plan will dump most new development on greenfield sites where building costs are lower, covering the Green Belt with dozens of housing estates that few residents want. 8,086 new houses are planned for the Green Belt but only 1,135 for Guildford urban area. This is disruptive, socially inequitable and unnecessary. It will not only destroy countryside but will also delay and disincenitivise much-needed urban regeneration. The remarkable revival and repopulation of central London shows that building dormitory satellite settlements is an out-of-date approach to planning.

I particularly protest at the "insetting" of 14 villages from the Green Belt, and at "infilling" 12 of the borough's Green Belt villages. I am deeply disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are "leggy" in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the "openness" of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF's other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hellbent on self-defeat.

I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors. To "inset" two thirds of the borough's rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough's location on the edge of Metropolitan London.
"8 See Ministerial foreword: "Our natural environment is essential to our wellbeing, and it can be better looked after than it has Habitats that have been degraded can be restored. Species that have been isolated can be reconnected. Green Belt land that has been depleted of diversity can be refilled by nature- and opened to people to experience it, to the benefit of body and soul."

"9 Councillor Matthew Sarti, Planning Committee meeting, 18 May 2016.

cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed "insetting" and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need (especially post-Brexit) and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17's aim of "empowering local people to shape their surroundings" and other NPPF provisions."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

SITES

1. Green Belt sites

I OBJECT to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that "allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses." This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. This amounts to a war of attrition by the Council in conjunction with developers, since many busy residents are sick and tired of repeating the same comments to deaf ears. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. "13

Some residents have concluded that commenting is a waste of time.

"13 Further discredited by criminality on the Council. Former Lead Councillor for planning Monika Juneja, architect of the 2014 draft plan, is currently serving a two-year sentence for 3 counts of forgery, pretending to be a barrister and obtaining dishonest pecuniary advantage.

All Green Belt sites should be removed from the plan until "exceptional circumstances" for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. "14

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/1679  **Respondent:** 10933857 / C J Tilbury  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**POLICY P3- Countryside (i.e. beyond the Green Belt)**

I OBJECT. This is more protective- as a policy- than the proposals for the AONB and the Green Belt, so is anomalous and wrong. I am not in favour of building on this area, since urban, brownfield areas are sufficient to meet all reasonable housing targets. There is no need to build on any green fields if brownfield, previously developed land is used efficiently (without garden-grabbing).

This policy refers to the countryside near Ash and Tongham (see paragraph 4.3.28). This area does not justify stronger policy protection than any other part of the borough. The fact that the current and previous Council Leaders represent it should not give it preferential status: "we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location". Green Belt and AONB areas should by definition have higher levels of protection than non-Green Belt areas.

It should also be noted that Ash and Tongham lie beyond Guildford far away from London and therefore make no contribution to controlling Metropolitan urban sprawl, unlike those villages which, ironically, are to be "inset". That is presumably why Ash and Tongham are not in the Green Belt already. This policy, however, attaches higher priority to preventing the "coalescence between the Ash and Tongham urban area and Aldershot" than it does to the primary purpose of the Metropolitan Green Belt, which is to stop London sprawl.

Apart from being a scandalous misuse of local political patronage, this policy effectively says, "Look, we are not destroying the Guildford Green Belt because we are extending it in Ash and Tongham." It is a cynical piece of tokenism. The leader of the Council needs to be seen to be above reproach by deleting this policy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/1680  **Respondent:** 10933857 / C J Tilbury  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**POLICY P4 - Flood risk and water source protection zones**

I OBJECT. Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding.
Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1681  Respondent: 10933857 / C J Tilbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (

POLICY P5 - Thames Basin Heath Special Protection Areas

I OBJECT. This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small as to be meaningless.

SANG (Suitable Alternative Natural Greenspace) is not beneficial since the sites identified or targeted are already green space. This is just using agricultural or wooded land as recreation land in order to justify building on other green spaces nearby. There is no actual increase in open space or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas. SANG- in part used to prevent dogs and cats attacking nesting birds - must also ensure that it is not using land which is adjacent to the Special Protection Areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1672  Respondent: 10933857 / C J Tilbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY S1 - Presumption in favour of sustainable development

I OBJECT. The NPPF states that the presumption in favour of sustainable development "should be seen as a golden thread running through both plan-making and decision-taking." 1 Standing at the head of the draft plan, Policy S1 ought to set a clear framework. Instead, no definition of "sustainable development" is given."2 The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.
The promise "to secure development that secures the economic, social and environmental conditions in the area" omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is useless. Under this policy, any development will qualify as "sustainable", thereby failing to apply the NPPF's most important guideline.

The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan's contempt for Green Belt constraints is amply demonstrated in later policies.

The commitment to approve planning applications "wherever possible" and "without delay" reveals this draft plan's pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17. In my view Policy S1 is a non-policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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POLICY S2 - Borough Wide Strategy

I OBJECT. I have 5 objections to the proposal to build 13,860 new homes:

1. The number is based on pre-Brexit projections for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.4

2. The number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, "West Surrey" is much too Half of Guildford borough's residents work elsewhere, and half the people who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent districts of Rushmoor and Mole Valley, minutes from Guildford town, are outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere. Unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and is part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council have failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so the housing numbers

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"1 NPPF paragraph 14.

"2 The most widely accepted definition is the 1987 United Nations one from the Brundtland Report: " Development that meets the needs of the resent without compromising the ability of future generations to meet their own needs."

"3 Including: " empowering local people to shape their surroundings ... Take account of the different roles and character of different areas... protecting the Green Belts around them ... recognizing the intrinsic character and beauty of the countryside and supporting thriving communities within it... Support the transition to a low carbon future ... Contribute to conserving and enhancing the natural environment and reducing pollution ... Encourage the effective use of land by reusing land that has previously been developed (brownfield land)... Conserve heritage assets ... Actively manage patterns of growth to make the fullest use of public transport and cycling and focus significant development on locations which can be made sustainable."

"4 At the time of writing , about £8billion (40%) has been wiped off the value of the UK's top 4 housebuilders alone .

derived from it are unreliable. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county (none in Mole Valley, for instance). This highly lopsided distribution is unexplained.

3. The figure of 13,860 new homes is It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA. "5 The Council say we should trust the contractors' model because it is used by a large number of other local authorities. Wide usage, however, does not confer objectivity . Guildford's OAN would fail the basic transparency test even if the methodology used were a universally admired 'gold standard'. But it is not: it belongs to consultants whose website openly proclaim their pro-development agenda,6 provoking reasonable suspicion that the figures are inflated. External experts and members of the public have provided detailed critiques of the model. Its most fatal flaw, however, is that it has not been disclosed- not even to the authors of the plan, who have taken it on trust. This is irrational and unsound.

4. The status of the 13,860 figure is ambiguous. The plan fails to set a Housing Target of new homes to be built, or explain how this relates to the "Objectively Assessed Number" (OAN) for housing need. Elsewhere, the Council have said that the two are identical because the OAN is "deliverable" and is by definition objective and cannot be contradicted, but in the same breadth say that infrastructure or other constraints may in due course affect deliverability.7 Despite the NPPF, the plan fails to address these constraints. In any case, the number of homes proposed, plus existing planning permission, plus expected "windfall" sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how can anything else be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a "plan" that fails to propose a Housing Target that takes normal constraints and adjustments credibly into account, and which leaves the Council to set one at any level without further consultation. Even if the OAN were not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

5. It is irrational to embark on a radical transformation of the borough without a clear Housing Most of Guildford borough is theoretically protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the existing number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Infrastructure is not in place that in any way deals with the amount of houses and commercial development being proposed in the Compton area and its surrounds. We are referring in particular to the B3000, A3 and A31. These roads are already at saturation point. They not only deal with local traffic, but also traffic, passing through to get to the West Country, Dover, London, Dorking and the Coast. An ever-increasing number of heavy goods vehicles using the B3000 have to pass over a narrow Victorian railway bridge causing difficulties for cars coming the other way and great danger to pedestrians or anyone on a bicycle.

Access proposed to some of the developments envisaged will also create congestion around the Business Park causing serious problems for ambulances to the Royal Surrey County Hospital, and also push more traffic though Compton by coming off the A3 at Compton and then using Down Lane to access Guildford or the proposed development.

Pollution on the B3000, which is already very high and not being addressed, will increase if further traffic is put on this road.

Research upon which assumptions have been made is often out of date. Traffic in this area steadily increases every year without the huge developments being imposed on the area without proper forethought.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

**Comment ID:** PSLPP16/11183  **Respondent:** 10934433 / Ömer and Sally Kirsan  **Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Areas of Outstanding Natural Beauty and the Green Belt are being deliberately ignored. These beautiful views will be gone forever.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

**Comment ID:** PSLPA16/2727  **Respondent:** 10934497 / Paula Heard  **Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There have been no plans to illustrate the improvement / changes to our roads ways to support the enormous increase in traffic if the Wisley / burnt common sites go ahead. There is no way to increase roads sizes through the Horsleys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1829  Respondent: 10934497 / Paula Heard  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to object to the Local Plan being considered by GBC.

Removing the Horsleys from the green belt...new major of London Sadiq Khan, has instructed planners not to approve development within the Green Belt, no exceptional circumstances have been demonstrated.

Extension of boundaries of settlement areas of the Horsleys...no sound reason has been given for the proposed changes.

INFRASTRUCTURE... There is no scope to improve the width of our roads, they are already being ruined by large lorries using them. The schools, medical centres, shopping areas are already overloaded.

DISTRICT CENTRE for station parade...this classification would be an entirely ridiculous reading of the nature of the facility. The traffic up and down Kingston avenue is impossible at present, let alone if it was increased to a District Centre.

2000 houses on former Wisley Air field / 2000 houses Gosden Hill Farm...... The impact on the Horsleys of these developments would be HUGE. There is no infrastructure to support them and no way that roads drainage can be extended. Are there plans for more schools, medical facilities, shop etc???? Public transport would need increasing, Horsley station is already overloaded.

I hope you will consider these objections

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11375  Respondent: 10934497 / Paula Heard  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Schools...the Howard of Effingham is already coping with 3/4 times the amount of students it was designed for. The plans for schooling facilities are not planned until years after building commences, they should be considered as a priority.

Medical facilities, same as schools - have you tried to get an appointment with your doctor lately!!!!! Even if surgeries are build where are the doctors going to come from ??????

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11368  Respondent: 10934497 / Paula Heard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

No exceptional circumstances have been demonstrated to remove the Horsleys from the Green Belt Traffic and parking - the impact on local roads would be tremendous. Stations and shopping areas are already at a maximum.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11377  Respondent: 10934497 / Paula Heard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Loss of GREEN BELT Sadiq Khan has instructed planners not to approve development on Green Belt within the M25. If we continue to abuse it there will be one left.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/11372  Respondent: 10934497 / Paula Heard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Flooding...the heavy rain we have had this summer demonstrates that the drainage in the areas us already not coping. To build houses in an area of level 3 flood risk, behind Ockham Road North, is ridiculous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/395  Respondent: 10934497 / Paula Heard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

The evidence has not been proven, or revealed in the plan to the general public or the GBC..

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6379  Respondent: 10934625 / 7UK Services (Paul Taylor)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We write to make the following objection to the draft Local Plan on behalf of businesses and residents.

We note that the draft Local Plan still has no proposals to reduce the number of conservation areas. This is illogical and inconsistent with the other proposal in the draft plan to remove some villages from the Green Belt. The existing conservation areas should be reviewed, reduced in number, and concentrate only on those areas where they are integral to the character of the area. For example, the Guildford High Street should be retained (though even this has inconsistent buildings such as Sainsbury's). Some village centers, such as Shere, should be retained. Other areas, such as those outside of the Guildford High Street, where there are residential areas which have changed significantly from what they were originally, should have their conservation area status rescinded as it is no longer applicable. Any special buildings in these areas could be Listed if they are not already.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3960  Respondent: 10934689 / Adam Fox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3959  Respondent: 10934689 / Adam Fox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of Send Village from the Green Belt because the village and its countryside provide a necessary buffer between Woking and Guildford. The green belt was intended to be permanent.

I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified, the Green Belt is meant to be permanent and not continually eroded.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7391  Respondent: 10934689 / Adam Fox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the large proposed development of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send. The A3 is already at capacity in this area and causes major delays accessing the M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7389  Respondent: 10934689 / Adam Fox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendi to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7388  Respondent: 10934689 / Adam Fox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
8. I object to building 400 houses and 7000 sq metres of industrial space at Garlick’s Arch, opposite Send Marsh Road. The site floods and is covered by ancient woodland. The industrial space is not needed in this area; there is already an industrial area at Slyfield. Guildford’s housing requirements have been shown to be grossly exaggerated. With proper use of brownfields sites this Green Belt site is not required.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/7387  **Respondent:** 10934689 / Adam Fox  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. I object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the (A247) would be gridlocked all day. Noise and pollution levels, already at excessive levels, would worsen.

6. I object to the proposed new interchange onto the A3 at Burnt Common because Send would be used as a cut through to the A3/M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/7390  **Respondent:** 10934689 / Adam Fox  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>As stated previously, this development is not warranted or welcomed to our rural village. We want an end to continually having to object to plans unfitting for this village.</td>
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<td>I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the proposal to inset Send Business Park from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
There is highly restricted vehicular access along Tannery Lane in both directions.
Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1187  Respondent: 10934689 / Adam Fox  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Clockbarn Nursery, Tannery Lane, Policy A42

I object to the Policy A42 change at Clockbarn in Tannery Lane because:
- The increase to 60 homes in place of 45 homes is 33% more and is already too much
- It ignores all the thousands of previous objections made by local people that live in Send
- It will worsen access and traffic problems in Tannery Lane and at the A247 junction
- It will make erosion of the Green Belt in our village worse
- It will make surface water flooding, which is already bad, even worse
- It will impact open countryside views from the River Wey Navigation
- The local school and doctor’s surgery are already at capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1188  Respondent: 10934689 / Adam Fox  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Garlick's Arch, Send Marsh, Policy A43.

I object to the Policy A43 change at Garlick’s Arch because:
- It ignores all the thousands of previous objections made by local people
- It is beautiful permanent Green Belt and no "exceptional circumstances" exist
• It will cause over-development of our village and the number of homes is hugely excessive
• It will join up Ripley and Send and defeat the key purpose of Green Belt
• It is subject to frequent flooding and is currently a flood zone 2 allocation
• It is contaminated by lead shot accumulated over fifty years
• It will generate excessive traffic that will block up the local roads even more than already does of Send and Ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1189  Respondent: 10934689 / Adam Fox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Burnt Common, London Road, Policy A58.

I object to Policy A58 at Burnt Common because:

• It was deleted from the 2014 draft because of all the objections made previously
• The word "minimum" is a change from the previous "maximum" in the 2016 plan and since that time there has been a decline in demand for industrial land
• There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
• The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt
• The impact on small surrounding roads will create traffic gridlock
• It will join up existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1353  Respondent: 10935009 / Richard Winton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I have lived here all my life and it is getting really sad, more houses, more people, more cars, why should I have to move because of Guildford Borough Council? Have you tried going out on the local roads between Send, Ripley and Clandon in the rush hour s from 07.00-10.00am and 4.00-7.00pm. Have you tried to park your car in Ripley lately during the day it's chaos.

Since you allowed Waitrose at the end of my road it has been a nightmare for traffic.

I know you have to build houses, but why not build them in areas closer, or as I think a part of Guildford, such as Merrow, Burpham, Worplesdon, Jacobs Well, Fairlands or Onslow Village.

We must keep our villages, we like visiting Guildford Town but we don't want to be a part of Guildford Town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/2418  **Respondent:** 10935009 / Richard Winton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Clock Barn Nursery allocation A42

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/2416  **Respondent:** 10935009 / Richard Winton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Garlicks Arch allocation A43

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I OBJECT to the north facing slip road allocation A43a</td>
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<td>I OBJECT to land west of winds ridge and send hill allocation A44</td>
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<td>Guildford Borough Council seems to be intent on spoiling our villages, Send, Ripley and Clandon. want to live outside Guildford, not inside.</td>
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<td>The roads between all these villages are country roads not suitable for a lot more traffic. Garlick’s Arch alone (400 houses) could produce 1600 extra cars on the road.</td>
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The north facing slip road is a no brainer attracting more traffic through Send and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4126  Respondent: 10935137 / Jack Winton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Clock Barn Nursery allocation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4124  Respondent: 10935137 / Jack Winton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Garlicks Arch allocation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4125  Respondent: 10935137 / Jack Winton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to north facing slip road allocation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4127  Respondent: 10935137 / Jack Winton  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to land west of Winds Ridge and Send Hill allocation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6971  Respondent: 10935201 / Cathryn Walton  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses.” This ignores the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. This amounts to a war of attrition by the Council in conjunction with developers, since many busy residents are sick and tired of repeating the same comments to a deaf audience. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. Some residents have concluded that commenting is a waste of time.

All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established.  

I OBJECT in particular to including Sites A36-41 (East and West Horsley). This is a back-door way to create a mega-village – essentially, a soulless new dormitory town. The Horsleys feel victimised by this plan, which has been masterminded by Council leaders representing Ash and Tongham at the other end of the borough, where (in a flagrant case of political double standards) the Green Belt is actually being extended under Policy P3.
Whatever their merits as development sites, the 6 Horsley sites should not be considered individually but for their cumulative impact on the contiguous villages of East and West Horsley.

Building 533 new houses on these 6 sites, plus at least another 90 on small sites is (a) excessive in absolute terms and (b) disproportionate relative to the rest of the borough. Under the plan, rural West Horsley will take 35% of new homes, Ash and Tongham 16% and Guildford urban area only 11%. The total number of homes in West Horsley will increase by 35%, which is disproportionate when measured against the overall increase in housing across the borough and particularly in Guildford town. If the Council have justifiable reasons to transform a particular community so radically, the plan should present a case rather than sneaking in site proposals as a fait accompli.

These sites will put unsustainable strain on local facilities and infrastructure, including public transport, parking, schooling, medical facilities, sewage, surface drainage and shops. For instance:

- Thames Water have advised the Council that the current wastewater network will not cope and that the foul drainage system all the way to the treatment works North of Ripley will need to be upgraded.
- Guildford Council’s Education Review says “expansion options may need to be considered for primary” education in the Horsley area within the first 5 years of the plan, but Surrey County Council has no plans to do so. The Raleigh School is already full. The private Glenesk and Cranmore schools are also at or near to full capacity. The suggestion that schools in Ripley can be used contradicts the plan’s stated intention to reduce traffic on the A3 and strategic aim that primary schools should be within walking distance.
- The plan’s Infrastructure Schedule (Appendix C) imagines an “East Horsley and West Horsley traffic management and environmental improvement scheme between 2019 and 2023 by Surrey CC” but gives no details. This scheme is just wishful thinking. The proposed housing can only harm the local environment, not improve it.

13 E.g. Gallagher Homes v Solihull Metropolitan Borough Council [2014] EWHC 1283
14 Councillor Paul Spooner and his predecessor, Councillor Stephen Mansbridge.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6972  Respondent: 10935201 / Cathryn Walton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The harmful impact of these sites is magnified by the proximity of the so-called Wisley Airfield site (Three Farms Meadow), with 2,100 new homes only 2 miles away (see below).

I OBJECT also to the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee recently rejected a recent planning application for precisely this development was unanimously on 14 separate grounds. This deceived many residents into thinking that it has been defeated: scandalously, the site had been included in the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers that they should try again.
This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given additional months to refine their application. Residents are disturbed by apparent party links between the ruling Conservative group on the Council and individuals connected to the developers, a shadowy Cayman Islands company.16

Three Farms Meadows before WW2 was a valuable agricultural asset to the UK. It still is. It grows enough wheat for 1 million loaves of bread.

The hamlet of Ockham gladly helped the war effort by allowing the fields to be used for the defence of the realm on the understanding and promise from HM Government that after hostilities ceased it would be returned to farm land and the hamlet to a quiet rural existence. For their loyalty to King and country the villagers have been let down and subjected to the threat of the engulfment of the hamlet and the end of their peace and quiet as well as the loss of a valuable food production resource that the country needs to be self supporting (UK only produces half of what it consumes as food. - 2015).

Ockham is a historic place. The home home of ‘William of Occam’ philosopher and author of Occam’s Razor. Ockham is the home of ‘Ada Lovelace’ the world’s first computer programmer (now on the UK passport)
The site of ‘The Ockam Hoard’ a Bronze Age Hoard of bronze axe heads and jewellery now at the British Museum.
The hamlet is a Grade 1 listed architectural treasure and must be protected.

Please remove Three farms Meadows from the Local Plan immediately.

Policy A35 should be summarily removed from the plan for all the reasons the development was rejected by the Planning Committee, including:

- Green Belt location and absence of “exceptional circumstances”;
- Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it;
- Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA);
- Proximity to A3/M25 bottleneck and Ripley village and roundabouts;
- Absence of adequate traffic data;
- Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school;
- Loss of high-quality agricultural land (55% of the site), in breach of national policy;
- Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households;
- Presence of a Surrey County Council safeguarded waste site;
- Cost of infrastructure required to the detriment of alternative more favourable sites;
- Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity;
- Impact on listed buildings;
- Difficulty of SANG siting and inability to divert residents and their pets away from the SPA;
- Extreme housing density with tiny garden spaces;
- Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure;
- Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames;
- Failure to evaluate the cumulative impact of this and nearby development sites on the area.

15 Application reference 15/P/00012.

16 Including the Rt Hon. David Mellor QC (its erstwhile founder and former Minister), Mr Michael Murray (spokesman for the project and Conservative cabinet member for planning policy at the Vale of the White Horse District Council in Oxfordshire) and the Hon. Charles Balfour (director, descendant of the Tory Prime Minister).
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8258  Respondent: 10935201 / Cathryn Walton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A40

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The density of new housing on the 6 Horsley sites is inappropriate, being greater than anywhere in the locality now.

Sites situated on the periphery of existing development in the Horsleys encroach on surrounding open fields and require the extension of settlement boundaries for which the plan presents no arguments. Contrary to NPPF paragraph 79, this will contribute to creeping urbanisation by attenuating the Green Belt corridors separating the Horsleys from neighbouring settlements.

Collectively, these 6 sites militate against NPPF paragraph 81’s encouragement of access to the Green Belt and its amenity and recreation value. This has been a success story in the Horsleys, with the creation of an amenity wood and community garden, the purchase of adjacent fields (East of Ockham Road North) by local residents in order to preserve their open aspect, well-maintained pitches for local football and cricket clubs, public tennis courts, open space for a high-quality campsite (at Waterloo Farm) used by many foreign tourists and the approval of plans for a “Theatre in the Woods” – making West Horsley the only village in Surrey with an opera house. The open nature of West Horsley determined that a long portion of the 2012 Olympic cycle races passed through the village. This route has been adopted by cyclists as a permanent asset, including the annual Prudential cycle race. These and future examples of “positive planning” depend on protecting the Green Belt to maintain the openness and attractiveness of the local landscape and avoiding the urbanisation and traffic congestion that Sites A36-41 will bring.

By surrounding Waterloo Farm campsite with 120 new houses, Policy A40 on land to the North of West Horsley will make this rural tourism amenity unviable. This may accord with developers’ plans, since the site would then be vulnerable to infilling with yet more housing.

Site A40 is subject to an unacceptable flood risk from a combination of a high groundwater table and the lack of surface water run-off. This is flat, clay land on the downhill side of the Horsleys where floodwater from new development will accumulate and back up onto existing properties nearby. I can provide photographs proving how badly these fields already flood at present. These problems will only get worse with the increase in extreme weather events that accompanies climate change. The “appropriate mitigation” suggested in Policy A40 exists only as an abstract notion. It should not overrule the need for Green Belt “exceptional circumstances”.

Policy A40 underestimates the problems of safe access and egress. Ockham Road North was closed for several weeks in 2014 because of flooding, and still floods regularly.

These problems are not confined to flooding and are not addressed by the proposal to extend the existing 30mph zone past the site access. Repeated attempts made by Ockham Road North residents to extend this zone have been turned down by the local authorities, Highways England and Surrey Police, even though data collected in 2015 show that traffic has doubled over the last 15 years and that the average speed in the 40mph section of this road is 52mph, with maximum
speeds of over 80mph. No traffic calming measures have been achieved. Additional housing will add to several hazards along this stretch of road, including:

- Its use by pedestrians, especially children (using the Raleigh and Glenesk schools and catching school buses to Guildford and Howard of Effingham), pensioners living in the string of bungalows at the northern end of the road, and visitors from the Waterloo campsite who are unfamiliar with the area.
- The existence of a narrow footpath on only one side of the road in any one spot. The layout means that walking half a mile between Green Land and East Lane requires crossing the road twice.
- The road’s increasing use by recreational cyclists (see above).
- Its winding nature, poor sight lines (especially when interrupted by summer vegetation) and dangerous, concealed driveways. Most of these were built in the 1930s. Some have been widened but many are too narrow for modern traffic. Since a deep ditch runs along most of the road, vehicles have to swing out dangerously when entering or leaving.
- The prospect of additional traffic, including 19,000 HGV movements (90 a day over a long period) if Surrey County Council approves the Drift Golf Course’s planning application to re-landscape its site using bulk waste transported from London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15376  Respondent: 10935201 / Cathryn Walton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force.

The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15377  Respondent: 10935201 / Cathryn Walton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1, not buried away as a minor detail in Policy D2.

This policy amounts to “greenwashing”, expounding aspirational environmental targets while ignoring the plan to build dormitory towns in the Green Belt that are environmentally and socially unsustainable. These settlements will require vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and higher greenhouse gas emissions and noise and light pollution. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital, especially the countryside, from futile attempts to rig the housing market.

This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is meaningless, since no such networks are available locally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT. This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to “support development” that might “enhance” heritage assets leaves ample scope for abuse in the form of destructive commercialisation and financial leveraging.

This policy is based on the false premise that Guildford’s heritage is inherently in decay. This is a developer’s charter – a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council’s aggressive reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the “reasoned justification”, the actual policy wording in the blue box leaves too many loopholes.

Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

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I OBJECT. This is a piously aspirational policy that does not address any of the obvious practical issues already touched on above:
The plan envisages that 40% of homes built will be “affordable”, but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called “affordable” homes or pay an “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand).
The number of homes planned in the urban area is too low. There is a glaring need for regeneration in many urban areas, but this is ignored in favour building homes on green-field sites instead. This will not meet urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure.
The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in rapid and continuous decline.
All the stated policy aims for “inset” villages will be negated by the sheer weight of new housing development proposed which would radically change their character forever. Against this disruptive background, it is barely relevant to talk about preserving views!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT because - the evidence base is unreliable;
there is unclear differentiation between B class uses;
only high value-added business uses, contributing to a modern “knowledge economy”, are desirable, not low-grade, low-employment warehousing which is also land hungry; industrial and commercial businesses must be concentrated in the urban area or existing business parks (e.g. Slyfield) not in the rural environment which the infrastructure is unable to support;
the rural environment must support micro- or high-tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I OBJECT. It would be more sensible to confine all new office and research and development (use Class B1a and B1b) floor space to Guildford town centre. I oppose the policy of expanding the Research Park onto Blackwell Farm (see my reference to “regulatory capture” of local public policy by the University, Policy H1, above). No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.</td>
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<td>I OBJECT. The policy of resisting change of use from B1a to residential flies in the face of positive property market solutions for the regeneration of brownfield land and is contrary to national Government policy which been permits changes of use from B1a (offices) to C3 (residential) and has recently been reaffirmed.</td>
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I OBJECT. The Council are required by the NPPF to facilitate commercial science and technology clusters. But, as with Policies H1 and E2 above, this policy seems to be dictated more by the ambitions of the University of Surrey than the public interest. In an extremely tangled sentence, it says that the Research Park will be “protected for business use… in any science… that is complementary to the activities of the University of Surrey.”

This fails to distinguish adequately between the University’s public role as a state-funded, academic institution and its private, financial interest in profit-making business spin-offs. It ignores enterprises that might be commercial rivals of the University. And it fails to consider the public harm done by turning the Research Park into a larger Business Park, such as the loss of Green Belt capital.

B1b should be the primary use class for the Research Park and applications for B1a should be resisted given the danger of diluting the core purpose and reputation of the park. The inclusion of B1c uses is inappropriate and unnecessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15371  Respondent: 10935201 / Cathryn Walton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism that require local people to be consulted and heeded, not ignored. Villages need protecting in terms of both design and scale.

Most of the economic activities listed in 4.4.44 depend on maintaining the rural character of our villages which would be endangered by the wholesale “insetting”, boundary expansion and house building proposed in other parts of the plan. This applies also to new and projected enterprises in the Green Belt (e.g. Grange Park Opera’s Theatre in the Woods in West Horsley, which requires a protected, rustic setting to be a success, not housing estates and congested roads). Policy E5 is incompatible with the high housing numbers proposed.

Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This disregards the responses from the 2014 public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15372  Respondent: 10935201 / Cathryn Walton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15373  Respondent: 10935201 / Cathryn Walton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. The policy “vision” refers to protecting the Guildford’s “unique setting” (including, surely, its surrounding Green Belt and countryside views) but this is not carried over into the formal policy wording in the blue box. It is therefore a worthless commitment.

There should be much more residential use of the town centre where most people, especially the young and less well-off, want to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose a visionary regeneration plan for the River Wey/Walnut Tree Close area, where there is arguably enough brownfield land for 4,000 new homes, meeting near all the borough’s housing need over the plan period without harming the countryside.

There is an urgent need for a brownfield register and to focus on brownfield redevelopment before considering development outside the existing urban area. CIL strategy must promote brownfield redevelopment.
Strangely, the policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

This policy also fails to provide guidance on design requirements, as required by the NPPF.11

Instead, it is far too concerned with shopping. Town-centre shopping is in decline internationally as consumers move irreversibly online. There is no need to expand physical retail capacity or warehousing floorspace, which will only kill off existing shops while using up valuable housing land. The delays to the redevelopment of North Street are symptomatic of shifting consumer patterns. Guildford is a large town without a single butcher or fishmonger, showing that the Council need to use the fiscal and other mechanisms at its disposal to support niche retailers. To opt for large, impersonal department stores and dull high-street chain stores at the expense of Guildford’s unique character would be an historic blunder. For this type of shopping, most residents can go to Woking or Kingston, whose ugly town centres should serve as a dire warning to Guildford planners.

NPPF 59: “Local planning authorities should consider... the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15374  Respondent: 10935201 / Cathryn Walton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposal that sites “on the edge” of District Centres being considered for retail developments. This is another Trojan horse policy, allowing retail hubs to be vastly expanded in order to smooth the way for vast new housing estates outside in the countryside (e.g. to meet the “everyday shopping and service needs” of the roughly 1,500 people living in the 600 new homes planned for the Horsleys).

This is a case of back-to-front priorities. Expanded local retail hubs are being proposed in order to justify more housebuilding in the villages, and in a forlorn attempt to mitigate the serious traffic and infrastructure problems this will create. The Council has no business facilitating new supermarkets in the Green Belt. Rural retail capacity should be left to local demand.

The policy proposes not a single measure to support existing rural shops and services that are the lifeblood of village communities, e.g. using business rates and other levers at the Council’s disposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15375  Respondent: 10935201 / Cathryn Walton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT (for the reasons given under Policy E8 above) to the proposal for retail development adjacent to the 6 rural centres, and sites on the edge of designated centres. This is creeping urbanization, damaging to the Green Belt and to Guildford town role as a thriving urban hub. It will contribute to urban decay and depopulation, just as expansion of the suburbs did to mid-20th century London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15359  Respondent: 10935201 / Cathryn Walton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.
The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.
I support higher density development in the urban area, without resorting to dehumanising, high rise buildings that developers commonly claim are necessary for financial viability.
Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.
Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area.
Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.
Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15360  Respondent: 10935201 / Cathryn Walton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people.

In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

I question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally (contradicting the Government’s policy of encouraging labour mobility and development in poorer regions, where homes are cheaper anyway); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes would be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed might influence the market in more remote parts of the UK, but not here.

This policy allows “affordability” to be a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15361   Respondent: 10935201 / Cathryn Walton   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions. The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/15380  Respondent: 10935201 / Cathryn Walton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. Most of the borough’s infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. Yet this plan’s commitment to building housing estates across the Guildford countryside will mean either major infrastructure investment that no-one is prepared to pay for or else a catastrophic and simultaneous collapse in transport, educational, medical, energy, water and communications services.

The plan targets greenfield sites – requiring heavy infrastructure investment – in order to generate CIL income necessary to meet an infrastructure shortfall that is already serious. This is not sensible. The current draft CIL scale also encourages development on greenfield sites rather than brownfield.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing infrastructure needs in this area is inadequate, identifying only the tip of an iceberg of existing congestion. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that involve demolishing property and road-widening in residential areas to solve the resultant congestion. The A3 improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place. These detailed investigations are being deferred until the planning application stage and will be left to developers to prepare. If a site then proves to be unsustainable its Green Belt protection will have been lost for no reason and unsuitable development will take place by a more insidious process.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritising greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow 12 on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognising this as a key issue, the plan is based on a wing and a prayer.

12 Residents have been incredulous at the Council’s failure to apply infrastructure constraints to housing numbers, in response first to the Issues and Options paper and then to the 2014 draft local plan. There were 20,000 responses each time.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15381  Respondent: 10935201 / Cathryn Walton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT. This policy is too vague and optimistic. Decisions by Highways England on improving the strategic road network (the M25 and A3) are still years off. The Council have suggested a very expensive tunnel under Guildford, but this is no more than a dream. Even if Highways England accepted this (which is highly unlikely in the post-Brexit public spending climate) it would not be built until the end of the plan period at the earliest. Other, less expensive A3 improvements, and changes to the Junction 10/Heathrow stretch of the M25, will also take years to agree and complete.

The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is foolhardy. Surrey is the most congested county in England, with 683 people per square Km, compared with an English average of 413. This policy will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone). This is a major development constraint that should have been applied to the OAN before this consultation, and not left up in the air.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15382  Respondent: 10935201 / Cathryn Walton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. This is another vaguely aspirational policy, based on wishful thinking and not grounded in the practical realities of daily life. It consists of a standard, box-ticking list of local government measures unrelated to the specifics of the plan. Like infrastructure, transport appears to be an afterthought; the policy fails in its essential job of guiding planning decisions, since it assumes development of any kind can be supported by sustainable transport.

The sustainability of the dormitory settlements which the Council want built across the countryside depends on a general “modal shift” from private car use to walking, cycling and public transport. This is unrealistic. The proposed sites are often miles away from the nearest railway station. Bus services even in the largest villages are almost non-existent – just one bus to and from Guildford each day in the Horsleys and none at weekends. Since bus services depend on profitability, they cannot be expanded and the Council are not proposing to subsidise new ones. Rural buses are too slow anyway for busy people. Most rural roads in the borough are narrow, winding, hilly, potholed, muddy and unlit. Many flood badly and have no footpaths.

The desired modal shift would require a comprehensive co-ordination of bus and train timetables with services every 10-15 minutes, seven days a week, to stops within walking distance of every home in the borough. This kind of integrated public transport system has been achieved in Switzerland, for instance, but only at huge public cost and thanks to a political consensus in favour of state ownership of trains, buses and the post office, which delivers rural passengers as well as mail. There is absolutely no chance of this in the UK.

The vast majority of the borough’s residents are not, in practice, able to cycle. This includes children, the elderly, commuters who have to look smart, the infirm, the unfit and people carrying goods or shopping of any kind. Dependence on walking and cycling discriminates against these groups, which include some of the most vulnerable members of the community. It is socially unjust.

One in two working people in Guildford commute for up to 3 hours a day. They will not leave their cars for even part of their journey if it means longer travel times. Park-and-rides are a welcome part of the transport mix but are too slow for commuters and others on a tight schedule. Well-
off pensioners seem to be the main beneficiaries. For an adult couple going shopping it is still cheaper to park in town. Forget about water buses. The Wey is too narrow and, with a river speed limit of 4 knots, boats are too slow for anything but recreation. Except on the tideway, not even the Thames has such services. The addition of two new stations appears attractive but will slow down train journeys, which are already slower than at any time since the 1930s. Knock-on effects on localities where the new stations are built have not been sufficiently worked out.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15383  Respondent: 10935201 / Cathryn Walton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. This policy is a box-ticking exercise with no teeth to it. It sits oddly with the plan’s onslaught on the Green Belt. The plan to build on large areas of countryside and to inset villages will cancel out any benefits from extending the principle of enhancing biodiversity beyond Biodiversity Opportunity Areas.

There is no mention of the value of wildlife gardening to biodiversity or the important role that larger gardens play in a village setting.

There is no mention of the impact of the plan on food production, or monitoring the loss of agricultural land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15362  Respondent: 10935201 / Cathryn Walton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. This welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT. This policy is tepid in support of the Metropolitan Green Belt even though it constitutes 89% of the borough and should be the cornerstone of all local planning policy.

It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the wider nation as to the people who live in it. It is not the Council’s to give away, and once it is gone it is gone forever.

Any policy on the Green Belt should start with a fair assessment of its value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

• Agricultural production
• Rural leisure and tourism amenities
• Water catchment
• Flood control
• Biodiversity
• Natural heritage
• A carbon sink for air pollution
• Room for public facilities such as parks and burial grounds
• Profitable film locations (e.g. Shere)
• Future economic potential such as mineral extraction (even fracking)
• Natural beauty, landmarks, open space, rural views and sight lines
• Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)8

As a matter of law, morality and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation.

It is disreputable to argue, as the Council does, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. No-one argues that we should sell 1.6% of British Museum artefacts in order to build houses.

I am not opposed to appropriate development in the Green Belt and recently supported a major planning application in my own village. But I fail to see why a system of fair burdensharing of new development cannot be applied to the borough’s existing settlements in proportion to their size. This would minimise the strain on infrastructure and maximise the chances of retaining the character of each settlement through gradual growth. It is reasonable to ask urban Guildford, with x times the population of semi-rural East Horsley for instance, to accommodate x times the number of new homes over the plan period.

Parish councils could be asked, and would no doubt be willing, to propose where their quota of houses should go. Most rural residents are reasonable people who, if not alienated by top-down planners, will support realistic numbers of new houses in their neighbourhoods. Unfortunately, this democratic, bottom-up approach has not been attempted.
Instead, while developers flip and land-bank urban sites as a financial speculation, this plan will dump most new development on greenfield sites where building costs are lower, covering the Green Belt with dozens of housing estates few residents want. 8,086 new houses are planned for the Green Belt but only 1,135 for Guildford urban area. This is disruptive, socially inequitable and unnecessary. It will not only destroy countryside but will also delay and disincentivise much needed urban regeneration. The remarkable revival and repopulation of central London shows that building dormitory satellite settlements is an out-of-date approach to planning.

I particularly protest at the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 Green Belt villages. I am deeply disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines.

The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hellbent on securing the rejection of the plan as a whole.

I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors.9 To “inset” two-thirds of the borough’s 9 rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly defeat them if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.10 The policy states that “the general extent of the Green Belt has been retained.” This is not true.

8 See Ministerial foreword: “Our natural environment is essential to our wellbeing, and it can be better looked after than it has been. Habitats that have been degraded can be restored. Species that have been isolated can be reconnected. Green Belt land that has been depleted of diversity can be refilled by nature – and opened to people to experience it, to the benefit of body and soul.”

9 Councillor Matthew Sarti, Planning Committee meeting, 18 May 2016.

10 See footnote 3 above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15364  Respondent: 10935201 / Cathryn Walton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
I OBJECT. This is more protective – as a policy – than the proposals for the AONB and the Green Belt, so is anomalous and wrong. I am not in favour of building on this area, since urban, brownfield areas are sufficient to meet all reasonable housing targets. There is no need to build on any green fields if brownfield, previously developed land is used efficiently (without garden-grabbing).

This policy refers to the countryside near Ash and Tongham (see paragraph 4.3.28). This area does not justify stronger policy protection than any other part of the borough. The fact that the current and previous Council Leaders represent it should not give it preferential status: “we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”. Green Belt and AONB areas should by definition have higher levels of protection than non-Green Belt areas.

It should also be noted that Ash and Tongham lie beyond Guildford far away from London and therefore make no contribution to controlling Metropolitan urban sprawl, unlike those villages which, ironically, are to be “inset”. That is presumably why they are not in the Green Belt already. This policy, however, attaches higher priority to preventing the “coalescence between the Ash and Tongham urban area and Aldershot” than it does to the primary purpose of the Metropolitan Green Belt.

Apart from being a scandalous case of local political patronage, this policy effectively says, “Look, we are not destroying the Guildford Green Belt because we are extending it in Ash and Tongham.” It is a cynical piece of tokenism.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15365  Respondent: 10935201 / Cathryn Walton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. Urban development on existing hard standing would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites which would not be available for housing under this policy. It is not the footprint of existing buildings that should limit future development, but the extent of existing hard standing. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15366  Respondent: 10935201 / Cathryn Walton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small as to be meaningless.

SANG (Suitable Alternative Natural Greenspace) is not beneficial since the sites identified or targeted are already green space. To create SANG is just using agricultural or wooded land as recreation land in order to justify building on other green spaces nearby. There is no actual increase in environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds – must ensure that it is not using land which is adjacent to the Special Protection Areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPP16/15357</th>
<th>Respondent:</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY S1 – Presumption in favour of sustainable development

I OBJECT. The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Standing at the head of the draft plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts. The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is useless. Under this policy, any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies.

The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all. This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17. In my view this is a non-policy.
1 NPPF paragraph 14.

2 The most widely accepted definition is the 1987 United Nations one from the Brundtland Report: “Development that meets the needs of the present without compromising the ability of future generations to meet their own needs.”

3 Including: “empowering local people to shape their surroundings… Take account of the different roles and character of different areas… protecting the Green Belts around them… recognizing the intrinsic character and beauty of the countryside and supporting thriving communities within it… Support the transition to a low carbon future... Contribute to conserving and enhancing the natural environment and reducing pollution... Encourage the effective use of land by reusing land that has previously been developed (brownfield land)... Conserve heritage assets... Actively manage patterns of growth to make the fullest use of public transport and cycling and focus significant development on locations which can be made sustainable.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15358  Respondent: 10935201 / Cathryn Walton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. I have 5 objections to the proposal to build 13,860 new homes:

1. The number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.4
2. The number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” triborough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

3. The number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.4
2. The number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” triborough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

3. The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA.5 The Council say we should trust the contractors’ model because...
it is used by a large number of other local authorities. Wide usage, however, does not confer objectivity. Guildford’s OAN would fail the basic transparency test even if the methodology used were a universally admired ‘gold standard’. But it is not: it belongs to consultants whose website openly proclaim their prodevelopment agenda. leading to reasonable suspicion that the figures are inflated.

External experts and members of the public have provided detailed critiques of the model. Its most fatal flaw, however, is that it has not been disclosed – not even to the authors of the plan, who have taken it on trust. This is irrational and unsound.

4. The status of the 13,860 figure is ambiguous. The plan fails to set a Housing Target of new homes to be built, or explain how this relates to the “Objectively Assessed Number” (OAN) for housing need. Elsewhere, the Council have said that the two are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. But they also say that infrastructure or other constraints may in due course affect deliverability. In contravention of the NPPF, the plan fails to address these. In addition, the number of homes proposed, plus existing planning permission, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how can anything else be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN were not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

5. It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

4 At the time of writing, about £8billion (40%) has been wiped off the value of the UK’s top 4 housebuilders alone. This has been challenged by residents including, by Mr Ben Paton, as far as the Information Ombudsman. But the Council have consistently refused to seek disclosure of the model.

6 See http://www.glhearn.com/developer/Pages/Overview.aspx: “We act for many of the leading developers.” G L Hearn is now part of Capita Real Estate.

7 See letter from Neil Taylor, Director of Development at Guildford Borough Council, in the Surrey Advertiser of 3 June 2016.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>pslp171/893</th>
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</table>
I object to the Council’s current Housing Target table sum whose figures to not equate, and who have not been transparent in disclosing the sources for these figures.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/3090  
**Respondent:** 10935553 / Jeffrey Wightwick  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We write to lodge our objection to the proposed plan to build on the greenbelt in the Horsley Development sites. There are not enough schools, doctors or other facilities to accommodate such expansion of houses, also the roads won't take any more traffic, they are bad enough as it is., we therefore object most strongly.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/885  
**Respondent:** 10935585 / Dianne Fish  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to register OBJECTIONS to the Proposed Submission Local Plan in respect of its impact on East and West Horsley.

**GREEN BELT**

No sound case has been made for justifying changes to Green Belt Boundaries laid down by national legislation.

The National Planning Policy Framework requires any change in Green Belt boundaries to be the result of exceptional circumstances. No exceptional circumstances have been demonstrated.

**PROPOSED HOUSING DEVELOPMENTS**

The proposed development of 533 homes on Green Belt sites, at much higher densities than currently exist, would be totally out of character with the existing houses and village layout. These developments would also be unsustainable in terms of drainage, roads capacity, schools, medical facilities, shops, parking and public transport.
LAND AT FORMER WISLEY AIRFIELD

The proposal to build approximately 2000 homes at this site is in effect the creation of a New Town in the Surrey Green Belt. This development would be a severe contravention of Metropolitan Green Belt policy and would have a major adverse impact across a widespread area, including East Horsley.

CONCLUSION

I object to the Proposed Submission Local Plan. The Council should be directed to amend the Local Plan by using brownfield and previously used land for housing instead of encroaching on Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3243  Respondent: 10935617 / A.L. Ayres  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Re objections

Has anyone seriously considered the total destruction of a village Not including the proposed 2000 houses at Wisley airport and taking the proposed appx 600 houses

Assuming minimum of two people per dwelling and possible one vehicle per house. The very minimum

What services such as doctors surgerys ,shops etc have been considered

On the subject of considererations, lets specifically mention Ockham Rd North and South. This Road is already too narrow with no room for widening

Two vehicles {lorries,coaches } cannot pass each other without mounting pavements

My suggestion as per my previous letteris:>>>>>>>>>>>>>>

Create another NEW TOWN  !!!!!!!!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2157  Respondent: 10936577 / James Pigram  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
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I object to the plan of having a four-way A3 interchange at Burnt Common. The reason to this is that Clandon Road is already extremely busy and dangerous every day with vehicles coming off the A3 and also there are long time congestion coming from Send to the roundabout at Burnt Common. The reduction of 80% in housing needs in the 2015 compared with the 2013 ELNA is not reflected in the traffic modelling.

I object to have a 7,000 Sq m industrial development at Garlick’s Arch. There is no demonstrated reason for having an industrial development when we have Slyfield close by. Glarlick’s Arch is also containing ancient woodland, our richest land based habitat which needs proper protection.

I object to the planned development in Send as it is a countryside village which separates both Woking and Guildford. Having more housing will make the two towns combined. Send should remain in the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/7329</th>
<th>Respondent: 10936929 / William McGowan</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42</td>
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I object to Send Village being removed from the Green Belt. The Green Belt was intended to be a lasting arrangement under the National Planning Policy Framework. There are no exceptional circumstances that warrant departing from that arrangement. Send’s Green Belt provides an essential buffer stopping Woking and Guildford comprising one conurbation. It is a betrayal of the trust that was placed by residents in local councillors and central government who gave clear undertakings to protect the Green Belt. These proposals represent a breach of representations made to, and the mandate given by, residents who elected them. From an ecological perspective, the erosion of the Green Belt, as would be the case if developments were to occur in Send, would threaten wildlife habitats and stand contrary to the environmental protection granted by the Green Belt status. Further impacts on amenities to residents and the landscape aesthetics of the Green Belt would be irreparable if such developments were to take place, forever destroying both the personality of Send village and the lifestyles of residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to building 45 houses at Clockbarn Nursery. Tannery Lane is an inadequate thoroughfare to access this site due to its narrowness and bends. It currently already supports heavy traffic. It frequently floods during rainfall, largely owing to the poor condition of the road. The junction with Send Road is already hazardous enough, with speeding cars driving through as they exit the A3. On top of all the foregoing, heavy traffic will be generated by the proposed 64 apartments at the Tannery and the building of the marina.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to building 400 houses and 7000 sq metres of industrial space at Garlick’s Arch, opposite Send Marsh Road. The site is inappropriate because currently it is covered by ancient woodland and is prone to flooding during periods of only light or moderate rainfall. This proposal represents poor planning and management because existing brownfield sites in Slyfield and elsewhere could be used. Furthermore, it is evident that the industrial space proposed is not actually needed but is seen as a stepping stone to further developments in the area. Owing to the notion that industrial developments beget further developments and the erosion of the Green Belt as a result, I believe that such planning is destructive and ethically wayward. The lack of transparency over the data that supports the construction of 400 houses at Garlick’s Arch reinforces my belief about the planning. I would be grateful if clear data could be presented to support this plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to a new interchange with the A3 at Burnt Common. This will have little effect on the traffic flow in the area in terms of dissipating congestion which at peak hours often extends from the A3 through Ripley and up to the roundabout at the Shell petrol station in Send. Similarly, traffic travelling in a south-easterly directions towards said roundabout frequently extends all of the way through Send village to the New Inn. It is worth noting that much of the traffic that passes through these areas does not necessarily originate in the Send area but instead in Guildford or Woking, representing the importance of this area as a thoroughfare for vehicular traffic. Currently this traffic experiences frequent roadworks and temporary traffic lights, increasing journey times year upon year. One can only imagine the congestion that will result if 400 homes are built at Garlick’s Arch, 45 houses are built at Clockbarn Nursery, 40 houses are built at Send Hill, 2000 houses are built at Wisley Airfield, 200 houses are built at Gosden Hill and 1850 houses are built at Blackwell Farm. Much of the traffic from surrounding areas would travel through Send. Noise and pollution levels would rise and degrade residents’ amenity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7328  Respondent: 10936929 / William McGowan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development of 40 houses and two travellers’ pitches at Send. It is an unsuitable location due to the narrow access road. The subsoil of the proposed site contains documented unsafe landfill waste registered at GBC. Development will again ruin a high amenity area set in beautiful countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1814  Respondent: 10936929 / William McGowan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Finally, I am concerned to read reports that there may be laws or regulations that may have been breached or may breached as a result of the making or implementing of the above proposals. If in the unfortunate case that there are such breaches involved in these proposals then residents obviously also reserve their rights to pursue whatever legal remedies or actions that jointly or individually may be available to them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<th>Comment ID: PSLPA16/2824</th>
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<tr>
<td>I OBJECT to all the proposed sites in Send because they were not included in the previous consultation in 2014. As a result, the infrastructure requirements have to been properly considered for the level of development proposed, to the detriment of the existing wildlife and residents. &quot;Sustainable development&quot; in my opinion has not been adequately defined in the Local Plan and the serious long term impacts that could result from the removal of Send Village from the Green Belt have not been adequately addressed and therefore should not proceed.</td>
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<td>I OBJECT to building 45 houses at Clockbarn Nursery because of inadequate access. As planning permission for 64 apartments and for the building of a marina in Tannery Lane has already been given, to grant further development would be a disaster as it would result in excessive traffic volume at the junction with Send Road.</td>
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I OBJECT to the building of 400 houses and 7,000 square metres of industrial space being approved for Garlick's Arch within the Green Belt. If a need for it had been demonstrated in the Plan, it could be located in an existing brownfield area such as Slyfield. Also, the land at Garlick's Arch floods and is covered by ancient woodland and therefore not suitable for housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the new interchange with the A3 at Burnt Common because the Transport Evidence in the Plan is incomplete and untested but it clearly follows that with 2000 new homes proposed for Wisley Airfield, 2000 at Gosden Hill Burpham and 1850 at Blackwell Farm, much of the traffic as a result of this development would need to travel through Send Road which is already heavily congested and has got significantly worse over the last 16 years that I have lived in Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the development of 40 houses and 2 travellers' pitches at Send Hill. It would be an inappropriate location because the single access road does not provide adequate access. Also, there is unsafe landfill waste registered on the site with Guildford Borough Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11864  Respondent: 10937025 / Louise McGowan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to Send Village being removed from the Green Belt. The Green Belt was intended to be permanent, as required by the National Planning Policy Framework. The proposal to remove Send from the Green Belt would destroy the personality and fabric of the village and those around it and the lifestyles and amenity of the residents and wildlife.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11865  Respondent: 10937025 / Louise McGowan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to Send being removed from the Green Belt as a consequence of a "housing need" figure of 13,860. It has not been made clear to the public how this figure was calculated, but it would appear to be inflated, as a large proportion of this figure would comprise Surrey University students who would only be temporary residents of the Borough.

I OBJECT to the failure of Guildford Borough Council to identify sufficient brownfield sites within the urban area. This area should be targeted first for development, before Green Belt is considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6755  Respondent: 10938241 / Alan Brockbank  Agent:
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<tr>
<td>I OBJECT to the proposed development of 2,000 houses at Wisley Airfield. The A3 is regularly grid-locked and this proposal will greatly add to congestion in the area.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT to building 45 houses at Clockburn Nursery. I live on Tannery Lane which is unsuitable for an increase in traffic and is becoming increasingly hazardous for pedestrians and dog walkers. My hedge at the front has been regularly driven into. The junction with Send Road can be a nightmare to get out of as it is.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT to the proposed development at Garlick's Arch. If the industrial space is needed it should be at Slyfield. I object that this was introduced at the last minute with no consultation which is disgraceful.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<td>I OBJECT to the proposed interchange at Burnt Common. The Send road is not equipped to take the extra traffic.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT to the Councils inadequacy in assessing infrastructure needs.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT to the removal of Send from the Green Belt. The Green Belt was intended to be permanent. This generation looking after the interests of those future generations. There are no special circumstances to justify abandoning it.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I OBJECT to the proposal to build 13,860 new homes. This is far too high and unsubstantiated. The suspicion is that consultants for developers have come up with this number and not councillors. The housing need has been grossly inflated. I OBJECT to the complete failure of GBC to identify sufficient brownfield sites which should be targeted first for redevelopment. What changes (2016)/further amendments (2017) do you suggest should be made to the document? Attached documents:</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I am very concerned about the effect on traffic and particularly Tannery Lane and the surrounding roads. I object to the Policy A42 change at Clockburn in Tannery Lane because: The increase from 45 to 60 homes is too much and a smack in the teeth for locals who have objected It will worsen Tannery Lane traffic What changes (2016)/further amendments (2017) do you suggest should be made to the document? Attached documents:</td>
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</table>
I object to the Policy A43 change at Garlick's Arch because:

- It seems to ignore previous objections from locals
- It is beautiful Green Belt
- It will be over-development
- Once woodland like this has gone it cannot be brought back

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:  pslp172/3743  Respondent:  10938241 / Alan Brockbank  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 at Burnt Common because:

- There is no need for development like this in the Green Belt when Slyfield and Guildford have empty sites
- The effect on traffic will totally alter the character of the area

I object to the proposal to inset Send Business Park from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is a highly restricted vehicular access along Tannery Lane in both directions
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

I do hope that notice will be taken of local objections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:  PSLPP16/18089  Respondent:  10939073 / Katie Waldner  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
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I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/18090  Respondent: 10939073 / Katie Waldner  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/18083  Respondent: 10939073 / Katie Waldner  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 and M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

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I object to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this
policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I object to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/4422  **Respondent:** 10939201 / Dylan White  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I’m sure you’re aware that the UK is twice as crowded as Germany and three and a half times more crowded than France. We have an ageing population so can not go on increasing at the rate we are, hopefully BREXIT will put a stop to this unsustainable uncontrolled rise in population from the EU. We also need to cut back on numbers coming here from outside the EU which hopefully can also happen soon. As BREXIT has just been given the go-ahead, this reduction in numbers can not have been factored into this plan, therefore it is ‘out of date’ already.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Regarding the Gosden Hill proposal. I notice this has an A3 junction, but IT’S NOT 4 WAY!!! This will mean that all traffic heading north has to come through Burpham to get onto Clay Lane and the existing junction, this is unacceptable. Many of us for years have been saying that our three A3 junctions all need to be made 4 way, when is this going to happen? I do not regard a tunnel under Guildford as a cost effective solution at all, it would be far better to spend that money up north, all we need is the junctions made 4-way please.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Guildford does need high density small affordable housing in the centre of town. It does not need 4 and 5 bedroom houses bought by people who commute to London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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Answer (if comment is on questions 1-7 of the questionnaire): ()

Many years ago it was decided to build the A3 as it would solve all our problems, it is now full up.
Also many years ago, it was decided to build the M25 as this would solve all our problems all the way around London, it is now full up.
It is blindly obvious that the south east of England has reached capacity on the roads and on the railways. What is needed is vast investment in the Midlands and the north of England so people move up there. Bring on the Northern Powerhouse!!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17935  Respondent: 10939201 / Dylan White  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford is a town surrounded by greenbelt, from various streets in the town you can see fields, it needs to be kept like this. Once that green is gone, it’s gone, we will end up with houses all the way to Woking which is not what people want. I notice all other Surrey areas have come in with much lower figures, why is Guildford so high?

Is it because GL Hearn have used flawed data to work out this very high need? Please explain how they came to make this calculation.

In summary, Guildford and the south east is full up. Guildford could not handle more than 60 houses a year let alone 600. But yes, lets have affordable flats and small houses in the town centre or on brownfield sites and lets get central government to invest in the north!! We have 1.7 million unemployed so lets get them working up north!!

Please send this draft plan back to the drawing board for the reasons given.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3898  Respondent: 10939617 / Trevor Jones  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a resident of West Horsley, I shall address some additional comments to my local area only:

1. I do not believe that a defensible case can be made for the proposed removal from the Green Belt of areas in the Horsleys in order to relax the constraints on development. Loss of the essential characteristic of openness through such action initiates an irreversible and self-perpetuating process of attrition which will transform the character of our villages so that they no longer resemble the places in which we once chose to settle.

2. I commend the effort that has been made to develop a Surface Water Management Plan (SWMP) to address flooding risks and note that this has identified a Horsley "Hotspot". While this will come as no surprise to residents, who will be familiar with recurring incidents affecting areas including The Street/East Lane, Ripley Lane and Ockham Road North/Ockham Road South, it is good that this existing problem has been formally recognised even if it remains to be adequately characterised. It is notable that the Hotspot (as delineated in the SWMP) includes, or is adjacent to, all of the proposed development sites identified for West Horsley in the Proposed Local Plan. Not only does this imply significant risk of adverse impact from uncontained surface water on these sites, but also an increased impact on their surroundings should they be developed as proposed.

<previous submission attached>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [GBC Local Plan comments 2014sep - copies consolidated.pdf](#) (140 KB)

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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</tbody>
</table>

The retention in the Plan of the inappropriate Wisley Airfield development seems paradoxical, given the outcome so far of the planning process, with the apparent impasse and likely inability of the developer to deliver a viable proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/4415</th>
<th>Respondent: 10940673 / Carolyn Davis</th>
<th>Agent:</th>
</tr>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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<tr>
<td>Comment ID: PSLPS16/4416</td>
<td>Respondent: 10940673 / Carolyn Davis</td>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I object to the proposed Garlick’s Arch development (A43)**

I object to the development of 400 houses and 7,000 sq m of industrial buildings and warehousing. There is no need for further housing on top of the 13,860 already proposed for the borough. This site is a new addition to the Plan and was not included in the regulation 18 draft; therefore it has NOT been consulted upon previously. It is an inappropriate location due to the permanent Green Belt status which prevents merging of settlements and is not an exceptional circumstance.

If there is a need for a further 7,000 sq m of industrial space, it should be at Slyfield.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/4414</th>
<th>Respondent: 10940673 / Carolyn Davis</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)**

I object to a new interchange with the A3 at Burnt Common (A43a) because Send and Clandon would have to take traffic from the proposed 2,000 new houses at Wisley Airfield, 2,000 houses at Gosden Hill, Burpham and 1,850 at Blackwell Farm. Much of this traffic to and fro the A3, M25, Woking and Guildford would go through Send. Send Road, which is already overloaded, would become gridlocked as would Ripley which is used as a rat-run if there is traffic congestion on the A3. Noise and pollution levels, already at excessive levels, would worsen.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
1. **I object to the proposed Send Hill development (A44)**

I object to the development of 40 houses and 2 travellers' pitches at Send Hill. This site is a new addition to the Plan and was not included in the regulation 18 draft: therefore it has NOT been consulted upon previously. It is an inappropriate location due to the permanent Green Belt status. The narrow width single access country road provides insufficient access. In addition, the subsoil of the proposed site contains documented unsafe landfill waste registered at GBC. Any development there would spoil a high amenity area set in beautiful countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9611  
**Respondent:** 10940673 / Carolyn Davis  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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2. **I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)**

The Plan does not provide an achievable strategy for improving capacity on the road infrastructure between Guildford and the M25.

The roads through Ripley, Send and Clandon already suffer from congestion as cars fight their way to get to the A3 and M25. The proposed development of 13,680 new houses in the area will result in a minimum, 13,680 new cars on the road and will mean grid-lock at peak times: week-day mornings between 6am to 9:30am, week-day afternoons from 3:00pm to 6:30pm. This is not sustainable from the increase in congestion as well as the greater pollution impact.

I object to the proposed development detailed in the local plan which will result in more traffic using narrow rural roads as well as a further deterioration in the road surface. Our roads do not have pedestrian footpaths and the proposed levels of development will result in the roads becoming ever more dangerous for pedestrians.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9614  
**Respondent:** 10940673 / Carolyn Davis  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
1. **I object to the lack of proper infrastructure planning for sites (Policy I1)**

   **I object.** I have grave concerns that no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to any development taking place, the existing residents in the local areas of Ripley, Send and Clandon will experience a deterioration in quality of life in many ways.

   Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development.

   Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

   Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

   **What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

   Attached documents:

---

2. **I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)**

   Highways England has no plans to even examine improving the A3 before 2020 and therefore there is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours, see item 2 above, and any development prior to improvement of these roads will only make the situations worse.

   **What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

   Attached documents:
**Answer (if comment is on questions 1-7 of the questionnaire): ()**

<table>
<thead>
<tr>
<th>1. I object to not protecting the Green Belt (Policy P2)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>I object</strong> to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43).</td>
</tr>
<tr>
<td>The Green Belt was intended to be permanent, as required by the National Planning Policy Framework. <strong>Local councillors and central government gave a clear election promise to protect the Green Belt and this reneges on it.</strong></td>
</tr>
<tr>
<td>Green Belt land is important for our wider environment, providing us with the trees and undeveloped land which reduces the effect of the heat generated by big cities. Instead of reducing this green space, we should be protecting and nurturing it so that it provides benefit for all. Green belt land needs to be cherished and protected, permanently. It does not belong to the Council to give away.</td>
</tr>
<tr>
<td>Rather than destroying Green Belt land forever, Guildford Borough Council should work with Parish Councils to identify existing brownfield sites which can be re-developed. We should not be taking Green Belt land over brownfield sites simply because it is cheaper for developers. The proposal to destroy Green Belt land is in clear contravention of central Government’s stated commitment for Green Belt protection.</td>
</tr>
<tr>
<td>The National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered or the development on Green Belt land and I can see no exceptional circumstances for these villages and surrounding land to be taken from the Green Belt.</td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<tr>
<td><strong>Attached documents:</strong></td>
</tr>
</tbody>
</table>

**Comment ID:** PSLPP16/9613  **Respondent:** 10940673 / Carolyn Davis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

<table>
<thead>
<tr>
<th>1. I object to the Local Plan as the development proposed will not be sustainable (Policy S1)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>I object.</strong> 13,680 new houses proposed between Guildford and the M25 is not sustainable and will have a permanently detrimental impact on the existing local communities including Ripley, Send and Clandon. Over-development will damage these local communities which do not need this many new houses.</td>
</tr>
<tr>
<td>Furthermore, the services in these villages will be unable to cope with the level of development proposed. The proposed sites of Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations within easy walking distance and rural bus services are forever reducing leaving residents to rely on cars to get around.</td>
</tr>
<tr>
<td>The development should be in urban areas where there is sustainable transport.</td>
</tr>
</tbody>
</table>
Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I object in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). Will you please confirm receipt and show this letter to the Planning Inspector for his due consideration?

The following aspects of the plan do not appear to have been adequately considered or have been dismissed;

- The re-designation of Green Belt land for development - Green Belt Policy Guidelines (NPPG 79-83) sets out to protect open space, prevent encroachment into the countryside and stop linear development leading to the joining together of developed communities all of which appear to have been ignored in the Send proposals.
- Adverse effect on local infrastructure
- Additional traffic
- Appropriateness of high density housing sites in what is essentially a semi-rural community
- Environmental impact

I set out below my objection to specific policies and matters within the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick's Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3094  Respondent: 10940833 / Natasha Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

I consider the "objectively assessed need" figure of 693 homes a year is too high.

- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes
  Page 13 of 17
  NJ Taylor-Objection to local Plan
  a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to a failure to correct for errors in the historical data for international migration flows, a issues with the way it considers students and affordability and flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld by the council and treated in secrecy by the council and cannot be checked making the process unaccountable.
  The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on "commercially confidential" modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6202  Respondent: 10940833 / Natasha Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford. The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt. The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement putting pedestrians at risk. Note that young families use the pavement to access Clandon school and everyday during rush hour traffic they put their lives in danger as no workable traffic calming measures have been implemented that prevent vehicles from mounting the pavement to pass each other at pinch points in the road or to manage the excessive speed of vehicles passing through the village.

I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed way junction at Burnt Common. This has the potential to generate large volumes of traffic including commercial vehicles on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham. No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

A new en-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km. Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The site was inserted in the draft plan at a late stage just before publication of the consultation draft. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys.

Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt. I have seen no evidence in the proposed local plan that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council may have been offered the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land, if needed, could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available.

Accordingly enabling development was not necessary. The same principle applies here)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick's Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site. Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current "soft” edge approach to Guildford.

Garlick's Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (Blc),
general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick's Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site?

There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Guildford Borough Council's own Green Belt & Countryside Report does not address Garlick's Arch at all, so there is no evidence base to support the inclusion of this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6207  Respondent: 10940833 / Natasha Taylor  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land for new on/offramps at Burnt Common (A43a)

The addition of north facing ramps to the A3 at Burnt Cornman would be a significant negative impact for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of 'through' traffic.

The route from London/M25 to Woking would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to these areas on small roads which cannot be improved and which were never designed for the current traffic levels let alone increases in traffic levels that would result if the proposal to build new on/off access to the A3 at Burnt common (A43a) were to proceed. The proposed Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12805  Respondent: 10940833 / Natasha Taylor  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3); I object to the local plan based on the impact it will have on the special countryside of the borough. The proposed development at Garlick's Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/12802</th>
<th>Respondent: 10940833 / Natasha Taylor</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E1</td>
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</table>

I object to the inclusion of a strategic employment site at Gosden Hill Farm (Policy A25). Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick's Arch (Policy A43). It is in a non sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development. The site is in any event subject to frequent flooding and unsuitable for development. If developed, the new employment site at Garlick's Arch, Send MarshlBurnt Common (A43), would be treated as a Strategic Employment Site,

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<table>
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<tr>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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<tr>
<td>I object to the location for new employment floorspace (Policy E2)</td>
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<tr>
<td>I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Proposals for new industrial, warehousing and storage (use Class Blc, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>There is no need for the new employment floorspace to be located at Garlick's Arch or Gosden Hill Farm. When near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.</td>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E6</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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<tr>
<td>I object to the loss of rural employment (Policy E5)</td>
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<tr>
<td>Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises,</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
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</table>
I object to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many "leisure and visitor attractions" already. The case for creating more is not made and no examples are given. Instead, the plan's explicit priorities should be:

1. To protect the borough's prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An "English town break" (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

3. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to Policy E7 Guildford Town Centre

The policy "vision" describes protecting the Guildford's unique setting and historical character and sets out some of the ways this will be done.

However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area. The policy does not address any of the major issues raised by the Council's own Town Centre Master Plan, the Guildford Vision Group's proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF. The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford's character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford town centre.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12808  Respondent: 10940833 / Natasha Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy HI - Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set niles on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated. I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If
all students are accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build new housing on the Hog's Back.

NJ Taylor - Objection to local Plan

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy 11)

Our villages are already suffering from severe congestion for much of the day) for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces. Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists pass through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians. The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough's infrastructure is already heavily strained.
However the plan's determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number. The policy wording says nothing about roads and traffic. The Council's methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

Comment ID: PSLPP16/12807  Respondent: 10940833 / Natasha Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years after any housing or industrial space is built and the required infrastructure may never be put in place. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network.

The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

Comment ID: PSLPP16/12799  Respondent: 10940833 / Natasha Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council's to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation.

Paragraph 4.3.16 only states that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified within the local plan. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise.

Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council's growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned.

I object to the "insetting" of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the "openness" of the Green Belt, a term which neither the plan nor the NPPF defines.

To "inset" two-thirds of the borough's rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough's location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed "insetting" and boundary extensions go ahead.

I object to the proposals to remove from the Green Belt the so called 'strategic sites' of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. The local plan fails to demonstrate any exceptional circumstances for these sites and villages (as mere housing need does not constitute a 'special circumstance') to be taken from the Green Belt. Once taken from the green belt they will be lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC's Green Belt & Countryside Report does not address Garlick's Arch (Policy A43 and A43a), so there is
no evidence base to support including this site. Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12814  Respondent: 10940833 / Natasha Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that "allocating these sites does not grant planning permission for development." However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether "exceptional circumstances" existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as well as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless "exceptional circumstances" for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/12801  Respondent: 10940833 / Natasha Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to development in areas which are at risk of flooding (policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick's Arch (Policy A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy S1 is deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions.

The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12793  Respondent: 10940833 / Natasha Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This policy largely disregards the 12 Core Planning Principles set out in NPPF paragraph 17. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy. The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12795  Respondent: 10940833 / Natasha Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Borough Wide Strategy (policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards in light of the Brexit decision. The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey".

Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the triborough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has to date failed to revisit the data to validate that it is correct despite overwhelming concerns raised by borough residents. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need", Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is "deliverable" and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council's cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt,44%AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Waking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the
need to build on Green Belt
or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done? The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas. The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick's Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send Page 3of 17
NJ Taylor- Objection to Local Plan border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards.

Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. The housing DAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councilors before being adopted.
2. The DAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, ADNB and road infrastructure, National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

3. The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an DAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

4. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

5. Much of the infrastructure required to support the level of development proposed is outside the Council's control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer's business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

6. The 40–45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

7. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.

8. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.

9. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound.

10. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018.

11. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars.

12. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.

13. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

14. The proposal for Garlick's Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

15. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

16. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
17. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, NJ Taylor-Objection to local Plan including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

18. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

19. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

20. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little. The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1520  Respondent: 10940833 / Natasha Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council's refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement 'Conservatives Say Green Belt To Stay', the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3426  Respondent: 10941057 / Tim Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of policy A43 of 7000sq m of industrial warehousing as the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft. Slyfield Industrial Estate still has spare capacity and could accommodate any additional warehousing need if required.

I object to the number of 693 new houses proposed in the Local Plan for each year. The numbers calculated in accordance with the SHMA do not reflect true local need and have been inflated by the way students, economic need and affordability have been calculated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
I object to the insetting of Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3839  **Respondent:** 10941057 / Tim Green  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I object to the erosion of the Green Belt in clear contravention of the Government’s and Conservative councillors’ election manifesto promises to protect the Green Belt. In particular, I object to Send being removed from the Green Belt (Policy P2) as Send provides a buffer between Woking and Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3842  **Respondent:** 10941057 / Tim Green  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Clandon

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I object to the insetting of West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7193  **Respondent:** 10941057 / Tim Green  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the inclusion of the planned development of 2000 houses at Gosden Hill Farm, Merrow (Policy A25) in clear contravention of the Government’s and Conservative councillors’ election manifesto promises to protect the Green Belt. I object to the unsustainable nature of the site, the poor air quality and noise pollution levels that will result and the infrastructure deficit that will result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6663  Respondent: 10941057 / Tim Green  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to proposed development of 1,800 houses at Blackwell Farm.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7195  Respondent: 10941057 / Tim Green  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to proposed development of 1,800 houses at Blackwell Farm.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6657  Respondent: 10941057 / Tim Green  Agent:
| Comment ID: PSLPS16/6661 | Respondent: 10941057 / Tim Green | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of Three Farm Meadows (Policy 35) due to the proposed removal of the site from the Green Belt when no exceptional, very special or special circumstances exist. In particular, I object to the unsustainable nature of the site, the poor air quality and noise pollution levels that will result, the infrastructure deficit that will result and the impact on views to and from the Surrey Hills.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPS16/7194 | Respondent: 10941057 / Tim Green | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the building of 45 houses at Clockbarn Nursery, Tannery Lane (Policy A42) on the grounds of inadequate access to and from the site. The roads surrounding the site are already hazardous, narrow and windy. Tannery Lane has already had planning permission granted for 64 houses and a marina and the location will not be able to cope with any more traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6656  Respondent: 10941057 / Tim Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I object to the inclusion of land at Garlick’s Arch, Burnt Common and the proposed 400 houses and 7000 sq m of industrial warehousing on that site (Policy 43). Policy A43 and A43A were included at the last minute. They were not in the Regulation 18 draft and had not been consulted upon prior to the inclusion 2016 Local Plan.

I object to the impact of Policy A43 on ancient woodland on that site, on noise pollution and air pollution levels. The site is also prone to flooding.

I object to the unsustainable nature of the site at Garlick’s Arch (Policy 43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7192  Respondent: 10941057 / Tim Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. I object to the inclusion of land at Garlick’s Arch, Burnt Common and the proposed 400 houses and 7000 sq m of industrial warehousing on that site (Policy 43). Policy A43 and A43A were included at the last minute. They were not in the Regulation 18 draft and had not been consulted upon prior to the inclusion 2016 Local Plan

I object to the unsustainable nature of the site at Garlick’s Arch (Policy 43).

1. I object to the impact that Policy A43A will have on the air quality for those living in the surrounding areas and for future generations.

2. I object to the impact on residents that the resulting noise pollution of Policy A43A will have.
3. I object to the impact of Policy A43 on ancient woodland on that site, on noise pollution and air pollution levels. The site is also prone to flooding.

4. I object to the impact that Policy A43A will have on the air quality for those living in the surrounding areas and for future generations.

5. I object to the impact on residents that the resulting noise pollution of Policy A43A will have.

6. I object to the inclusion of policy A43 of 7000sq m of industrial warehousing as the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft. Slyfield Industrial Estate still has spare capacity and could accommodate any additional warehousing need if required.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6655  Respondent: 10941057 / Tim Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the creation of a new 4 way interchange onto the A3 on the A247 (Policy A43A) as this would add to the ever increasing levels of traffic on the A247, A3 and through Send and Clandon. Send would become a through route to and from the A3 and will become gridlocked all day.

I object to the impact that Policy A43A will have on the air quality for those living in the surrounding areas and for future generations.

I object to the impact on residents that the resulting noise pollution of Policy A43A will have.

I object to the impact of Policy A43 and A43A on local infrastructure. Congestion levels on A247 are already increasing at an alarming rate and will be further exacerbated by the development of Garlick’s Arch as the residents will have to rely on the use of private cars.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7191  Respondent: 10941057 / Tim Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the creation of a new interchange onto the A3 on the A247 (Policy A43A) as this would add to the ever increasing levels of traffic on the A247, A3 and through Send and Clandon. Send would become a through route to and from the A3 and will become gridlocked all day. An alternative location at the current exit off the A3 going North at the far end of Burnt Common beyond the existing auction house is far more preferable as there is existing dual carriageway roads already in place.

I object to the impact of Policy A43 and A43A on local infrastructure. Congestion levels on A247 are already increasing at an alarming rate and will be further exacerbated by the development of Garlick’s Arch as the residents will have to rely on the use of private cars.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I object to the inclusion of land west of Wind Ridge and Send Hill designated for 40 homes and 2 Travellers’ Pitches (Policy A44). The site was not included in the Regulation 18 draft and has not been consulted upon prior to the inclusion in the 2016 Local Plan.

I object to the impact of Policy A44 on an area of beautiful Green Belt countryside.

I object to the impact of Policy A44 as the subsoil of the existing site contains documented unsafe land fill waste which is currently vented.

I object to the impact of Policy A44, which includes 2 Travellers’ Pitches, on the local infrastructure. The narrow width single track country road provides insufficient access for the pitches.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the impact of Policy A44 on an area of beautiful Green Belt countryside.

I object to the impact of Policy A44 as the subsoil of the existing site contains documented unsafe land fill waste which is currently vented.

I object to the impact of Policy A44, which includes 2 Travellers’ Pitches, on the local infrastructure. The narrow width single track country road provides insufficient access for the pitches.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Following the approval of the revised Local Plan by the full council of Guildford Borough Council on 24th May, I would like to make it clear that I object to the provisions set out in the Local Plan as they threaten to destroy the established nature and identity of our villages by building on Green Belt land and will add considerably to the already unacceptable levels of traffic on the A3, A247 and M25 and many other roads in the borough.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
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I object to all sites in West Horsley for over 5 homes. The proposed sites will merge the villages of Oakham, West and East Horsley creating urban sprawl.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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I object to the fact that insufficient consideration has been given to the harm that will be caused to the Special Protection Area, the Sites of Special Scientific Interest and the borough’s Conservation Area and heritage assets.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<td>I object to the impact that additional residents will have on local roads, health services, education spaces and policing needs.</td>
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<td>I object to the impact of further congestion on local village roads and lanes.</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the impact of excessive development on the A3 and M25 on air quality. The air quality in many parts of the borough is greater than EU permitted levels and will damage the health of residents and future residents.
2. I object to the fact that 70% of the proposed 13,860 houses are designated on Green Belt land along the A3. This will result in gridlock on the A3, the A247 and the surrounding roads which are already at capacity.
3. I object to the inadequate protection of the environment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16131  Respondent: 10941057 / Tim Green  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the impact of further congestion on local village roads and lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13992  Respondent: 10941057 / Tim Green  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the inadequate protection of the environment.

I object to the fact that insufficient consideration has been given to the harm that will be caused to the Special Protection Area, the Sites of Special Scientific Interest and the borough’s Conservation Area and heritage assets.

I object to the impact of poor air quality on the Special Protection Area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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I object to the erosion of the Green Belt in clear contravention of the Government’s and Conservative councillors’ election manifesto promises to protect the Green Belt. In particular, I object to Send being removed from the Green Belt (Policy P2) as Send provides a buffer between Woking and Guildford.

I object to the insetting of Ripley.

I object to the insetting of West Clandon.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that 70% of the proposed 13,860 houses are designated on Green Belt land along the A3. This will result in gridlock on the A3, the A247 and the surrounding roads which are already at capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all sites in West Horsley for over 5 homes. The proposed sites will merge the villages of Oakham, West and East Horsley creating urban sprawl.

I object to the allocation of sites in unsustainable locations.

I object to the failure of Guildford Borough Council to include the Town Centre Masterplan 2015 in the Local Plan and to find sufficient brownfield sites for development prior to considering sites within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the allocation of sites in unsustainable locations.

I object to the failure of Guildford Borough Council to include the Town Centre Masterplan 2015 in the Local Plan and to find sufficient brownfield sites for development prior to considering sites within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2881  Respondent: 10941057 / Tim Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to changes relating to policy A43 Garlick’s Arch because:
- Again you have ignored the thousands of previous objections.
- There are no “exceptional circumstances” required to develop on this Green belt.
- It will generate excessive traffic along the Clandon Road with associated noise and light pollution. This will be made even worse if the adjoining Policy A58 is implemented.
- It would appear that there is no demand for Travelling Showpeople plots.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2882  Respondent: 10941057 / Tim Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to changes relating to policy A43 Garlick’s Arch because:
- Again you have ignored the thousands of previous objections.
- There are no “exceptional circumstances” required to develop on this Green belt.
- It will generate excessive traffic along the Clandon Road with associated noise and light pollution. This will be made even worse if the adjoining Policy A58 is implemented.

- It would appear that there is no demand for Travelling Showpeople plots.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/2880  **Respondent:** 10941057 / Tim Green  **Agent:**
**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

**Do you consider this section of the document; complies with the Duty to Cooperate?** ()  **is Sound?** ()  **is Legally Compliant?** ()

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to changes relating to Policy A58 Burnt Common because

- This Policy was deleted from the 2014 Plan following previous objections.

- Additionally i see the Plan now references ‘Minimum’ rather than the original ‘Maximum’ referring to the 7,000 sq feet of industrial or warehousing. If the original proposal was deleted again i see no reason why the changed plan actually increases the proposed level of development.

- There is no need to develop on this section of Green Belt land when other local sites including Slyfield and Guildford have empty existing sites and ‘brown field’ sites amiable.

- The impact on the Clandon Road and adjoining roads will create huge traffic issues, and noise and light pollution issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/3733  **Respondent:** 10941153 / Michael Cox  **Agent:**
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate?** ()  **is Sound?** ()  **is Legally Compliant?** ()

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
**A35 Land at former Wisley Airfield** Guildford Borough Council has already refused this development of over 2000 houses, so why is it in the Local Plan? The local roads will be unable to cope with an additional 4000 cars and there is no access directly on to the southbound A3 without going through Ripley village.

We believe that Surrey County Council has earmarked this site for a recycling facility and feel that a better use would be to have an Electricity Generating Plant burning waste materials which would be a benefit to the local area (the traffic movements would not be as great as the proposed small town). The runways could be used to site Solar Panels to produce electricity as well, these could be screened by planting trees (environmentally friendly) on the Ockham side. The farmer who cultivates the land could be encouraged to produce a crop which could be used for the production of Bio Diesel. This would make Guildford look like a "forward thinking" Council taking care of of the environment and doing its bit for climate change.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/3735  **Respondent:** 10941153 / Michael Cox  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/3735  **Respondent:** 10941153 / Michael Cox  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**A43 Land at Garlick Arch, Send, Send Marsh/Burnt Common and Ripley** This proposed development of 400 homes and an industrial estate is too large for the area. Admittedly part of the site is a Brown Field site already developed for commercial uses. However the local infrastructure will be unable to cope with the large amount of traffic generated (possibly 1000 vehicles). The suggested new slip road onto the A3 northbound would help to stop vehicles going through Ripley Village. However take a look at the A3 northbound on a Monday morning during the peak time (during term time) and you will see that the traffic is stationary back to Burnt Common, therefore people will still go though Ripley Village to queue jump and that will cause a traffic jam there.

The Greenbelt was created to protect rural communities and to stop urban sprawl. The villages in Guildford Borough need this protection and therefore any plans to erode the Green Belt must be abandoned.

The proposals outlined in the Local Plan do not state how the Borough intends to address the education, health, pollution, and public transport problems that the increase in the population in the area will cause.

To sum it up we feel the number of houses proposed throughout the entire borough is far to large. The erosion of the Green Belt should must not be allowed. The increase of vehicles on the roads will increase the pollution in the area adding to health problems.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/8004  **Respondent:** 10941153 / Michael Cox  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
The local roads in the Guildford Area are already at capacity, especially the A3 and need major work on them to keep the traffic flowing. This should be the Council's priority before any new developments are envisaged. Any new developments in the Ripley, Burpham, Send and Wisley areas will result in the A3 becoming totally clogged (even with the suggested new slip roads at Burnt Common and Railway Station at Merrow) and vehicles being unable to move in peak times which will have a knock-on effect for local businesses and freight companies losing money because of delays. The frustrated drivers will then decide to avoid the A3 and take to the declassified roads which are not designed for high levels of traffic. Remember for every house built there will be on average 2 cars.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The proposed density of housing in the Horsleys would put an intolerable burden on the residents who already have difficulty in parking at the few shops and at the station.

The roads in West Horsley are already in a very poor state of repair without the addition of the hundreds of cars the new residents would bring.

New schools and surgery would be medical and the provision for coping with extra sewage and drainage to prevent flooding.

Surely a much limited number of houses, built on brown sites and without destroying the Green Belt and the character of this beautiful part of Surrey would be so much appropriate.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/2964</th>
<th>Respondent: 10941697 / Adrian and Tina Curtis Wylde</th>
<th>Agent:</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT to Send Village being removed from the Green Belt as the original purpose of this concept, to inhibit the spread of the suburbs in to rural and semi-rural areas, is as valid as it was when it was conceived. There are no special circumstances to justify abandoning it.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>Attached documents:</td>
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<th>Comment ID: PSLPA16/629</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the following:</td>
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<tr>
<td>I object to the number of homes (693p.a.) that the Plan intends to deliver</td>
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<tr>
<td>I object to the enclosure of protected Green Belt land within the proposed new village boundaries (for which there will be a presumption for development in the future)</td>
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</tbody>
</table>
I object to the Garlick's Arch proposal to build 400 houses and 7,000 sq metres of light/general industrial/ storage distribution space on the Green Belt.

I object to the creation of new north and southbound slip roads to and from the A3 to the A247 Clandon Road (Policy A43A) at Burnt Common.

I object to the wholesale destruction of the Green Belt in this area (including the planned development of 2,000 homes at Gosden Hill Farm, Merrow, Policy A25) in clear contravention of the central government's stated commitment for Green Belt protection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6042  Respondent: 10941697 / Adrian and Tina Curtis Wylde  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the building of 400 houses at Garlick's Arch. Building 400 houses at this location would put undue strain upon the roads and facilities of Send and Ripley and contribute greatly to the creeping suburbanisation of the area. Bear in mind also the close proximity of the new houses to the pollution and noise from the A3 traffic, which will only increase in future years.

I object to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available.

I object to the development at Garlick’s Arch because the site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The site is also subject to flooding.

I trust that due account will be take of my views.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/52  Respondent: 10942017 / Jason Fenwick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A 43. Land at Garlicks Arch, Burnt Common. In the previous local plan suggestions were made to building around this area, from memory along the A3 by the Ewbanks site. Either way this development of 400 houses is far too large for the local infrastructure to take, firstly we do not have enough school capacity, particularly secondary schools with Send moving in and out of the George Abbott catchment area depending on the year, leaving little to no options, plus our local medical surgery is already at full stretch with waiting times of up to two weeks for an appointment. I object on this point. With regards to the proposed new A3 junction at Burnt Common this will just turn Send and Ripley into a car park. The A247 between the A3 and Woking is already nearing capacity and long queues form in both directions daily. Between the extra 400 new homes at this junction along with others commuting in and out of Woking this road will become very congested. Safety also needs to be considered as well as the new Send first and middle school is being built on the A247. I strongly object to this proposal. Industrial and warehousing is not required in this area. The proposed site is within two miles of Slyfield Industrial Estate, this site has more than enough Brownfield space for the development of this kind. I suggest you look to push through the Clay Lane relief road linking the A3 directly to this Estate and develop this area which will affect no local residents rather than put an industrial and warehousing units in a residential area where locals residents would be subject to noise and air pollution from heavy goods vehicles. I strongly object to this proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/37  Respondent: 10942017 / Jason Fenwick  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to strongly object to the revised GBC local plan for the following reasons.

1. Policy P2. Removal of Send from the Green Belt. In the new local plan document on page 29 Send is referred to as a "Rural Local Centre" yet the plan suggest removing the green belt along the banks of the River Wey Navigation, Garlick's Arch and around the village school. The local area is already very busy and congested, and we need to preserve the "village feel" in these rural areas for the sake of existing residents and their children as well as anyone looking to move to the area, part of the charm of the villages surrounding Guildford is that you can live in areas with outside green spaces with the benefit of having a large town centre close by. The removal of Green Belt status will open the door to more planning applications to greedy private land owners to "fill in" these current Green Belt spaces if you change the status of these leaving them exposed. For these reasons I very strongly object to these proposed changes and we will do everything we can to stop them happening.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/38  Respondent: 10942017 / Jason Fenwick  Agent:
<table>
<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</th>
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</table>

The revised GBC local plan has not considered the local community and the effects in it. I understand the need for development but it is not being suggested in the right areas or size of development. We do not need a major junction at Burnt Common to serve Send and South Woking if development plans are considerate. We do not need industrial and warehousing developments in Send that can be made in Slyfield, and other town centre locations where vast swathes of brown field land/sites stay vacant. We haven't the social and local infrastructure for a further 500 houses in Send.

I strongly object to this new GBC local plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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| Comment ID: pslp172/443  | Respondent: 10942017 / Jason Fenwick  |
| Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): ( ) |

**Objection 2: Land at Burnt Common, London Road, Policy A58**

I object to the plan for Land at Burnt Common, London Road, Send, Policy A58. The new change states that there will now be minimum development rather than a maximum development of industrial/warehousing on this land. Has anyone actually considered the potential for queuing traffic on that A3 junction. Has anyone consider the extra heavy freight using the A247 into Woking or through Ripley? Has the need for such development been properly assessed? This development is not required at all, let alone a change in the plan to say it may be developed to a larger size than initially proposed. They are plenty of empty industrial/warehousing sites in and around the Guildford/Woking area, Slyfield, Sheerwater etc. This will bring nothing but misery to the local population and I think will detrimentally ruin the area affecting house prices and people will leave the area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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| Comment ID: PSLPA16/811  | Respondent: 10942081 / G J Teague  |
| Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. 2. Housing Assessment

The number of houses planned in the Borough since the last consultation has risen to 693 p.a. over the next 20 years. The Foreword to the Plan (under the rubric "Key Facts") at tributes to the ONS in a footnote a prediction of a population of 162,188 by 2033.

Implementation of the EU Referendum decision last month, to which the new Prime Minister has publicly committed the UK Government, could well result in a further, potentially large, reduction in international migration to the UK over the period covered by the draft Plan. This must surely give pause for thought. The harm to the Green Belt villages and the Horsleys in particular will be irreparable if development is allowed to proceed on the basis of overstated projections. The ONS will have to revisit its forecast, the adequacy of which is now clearly in question.

Development of the Plan should be paused, and submission to the inspectorate deferred, to allow for updated ONS modelling to become available. Alternatively, given the current uncertainty, a more conservative approach - perhaps based on the level of growth envis aged in the current 2003 Plan - should be adopted with respect to predicted future new household formation for the next 8-10 years, and the number of new houses needed materially reduced, with the ability to reset at the end of the next parliament in 2025. By then the long term consequences of the Brexit referendum (including the effect(s) on economic growth) should be clearer, and adequate evidence of future needs capable of being generated. It is clearly untenable for the Plan to go forward in its current form, as if nothing had happened. It would be unreasonable not to adjust the Plan in the light of referendum, and in any event, submission in its current form would be non-compliant with the NPPF requirement (at para 158) to ensure the Plan is based on adequate and up to date evidence.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
states, wholly implausibly, that 'the Plan performs well'. Promoting huge increases in new houses in rural villages without any detailed planning or committed funding for associated infrastructure is absurd. The Plan is not compliant with NPPF (para 182) as it does not adequately address infrastructure requirements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/813</th>
<th>Respondent: 10942081 / G J Teague</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. Housing need in the Horsleys

The number of houses planned over the next twenty years at the 6 main sites in the Horsleys is 533. (At least 90 further houses could also be developed on smaller sites, according to the Horsley Countryside Preservation Society.) Development on this scale would damage irretrievably the semi-rural character of the Horsleys, the principal attraction of these villages for their existing residents and taxpayers, to whom the Council is supposed to be accountable. The main centre of employment and future economic growth in the Borough is Guildford itself, yet the Horsleys (and other surrounding Green Belt villages) appear expected to take a disproportionate share of expected new housebuilding.

Approximately 65% of the planned new housing is to be built on Green Belt land. Adequate consideration of reasonable alternatives, such as focussing on high density developments within the curtilage of Guildford itself, does not appear to have been undertaken. The Plan is therefore not compliant with NPPF (para 182).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPS16/1342</th>
<th>Respondent: 10942081 / G J Teague</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
9. Proposed development of former Wisley Airfield

I object to this proposal.

The potential development of some 2,000 new dwellings in the middle of the Green Belt is completely unacceptable. No evidence has been offered of any special circumstances justifying development in the Green Belt, and thus the proposal does not comply with the NPPF (para 83.)

The character and amenity of the Horsleys (2.2 miles away as the crow flies), would be irreparably damaged by the resulting enormous pressures of some 5,000 extra residents on local transport infrastructure and on educational and medical facilities. No credible assessment appears to have been made of these impacts on the Horsleys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1341  Respondent: 10942081 / G J Teague  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A36

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

9. Proposed development of Thatcher's Hotel

I object to this proposal.

Thatcher's Hotel is a longstanding amenity of East Horsley. Increased patronage appears likely when the new West Horsley Place opera commences. While the NPPF (para 89) allows for redevelopment of previously developed sites within the Green Belt, the redevelopment must not have a greater impact on the openness of the Green Belt than the existing development.

Erecting 48 houses on the site implies a density, and spatial orientation, clearly at odds with this criterion. Reasonable alternatives, such as converting the existing buildings into flats (like the sympathetic conversion of Maranello House on the main shopping parade), and without increasing the scale or existing footprint of the hotel, do not appear to have been considered.

Access to and from the A246 at the present entrance to the hotel would likely be insufficient, and any enlarged or new entrance onto the A246 would increase traffic, and worsen an existing hazard in the vicinity of a sharp bend, which has been the scene of multiple accidents over the years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2782  Respondent: 10942081 / G J Teague  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5. Infrastructure and Environment

The scale of development proposed for the Horsleys, together with other planned development in adjacent areas, threatens severe strain on local facilities and thus unacceptable impairment of residents' quality of life. Serious probable impacts include:

- Traffic: allowing for 2 cars per new house, potentially up to a 1,000 additional vehicles in the Horsleys alone will require access to, and use of, the Ockham Road(s), Forest Road and the A246. The existing congestion on these routes will likely be severely exacerbated. These routes cannot easily be widened without unacceptable encroachment on existing households, and increasing the speed limit would constitute an unacceptable risk to safety. No serious assessment of the impact on the existing local transport network appears to have been included.

- Parking: The car parks at both Horsley and Effingham Stations are already full on week days, likewise the car park at the Horsley Medical Centre, and close to full at most times of day at the two main shopping parades in East Horsley. No thought appears to have been given to the Development at Wisley Aerodrome would likely further exacerbate the situation, given that these stations are the closest to that site.

- Pollution: The large increase in the volume of traffic in the Horsleys resulting from the proposed plan will materially increase existing nitrogen dioxide and particulate emissions. Again, no consideration appears to have been given to this impact.

- Medical Facilities: The Horsleys are served by just one outpatient medical centre (with 4 permanent full time practitioners), and it is now common to have to wait two weeks or longer for a GP appointment. Adding potentially 1,000 new residents (allowing for at least two residents for each new home) risks straining the existing service to breaking point. The Plan appears to take no account of this impact.

- Schools: Schools in the Horsleys are at, or close to, capacity. No new school places appear to be planned to provide for the increased demand resulting from the creation of new households. No account appears to have been taken of this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
3. Removal of the Horsleys from the Green Belt (Policy P2 Green Belt)

I object to this policy.

The draft plan proposes that the Horsleys be removed from the Green Belt. The NPPF (Para 83) requires any change of Green Belt Boundaries to demonstrate exceptional circumstances. The Written Ministerial Statement of 1st July 2013 clarified that the single issue of unmet housing need is unlikely to outweigh the harm to the Green Belt necessary to constitute such exceptional circumstances. The Plan states (Policy P2 para 4.3.16) ”We consider exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development”. No objective evidence is offered of any exceptional circumstances justifying the Horsleys' removal from, and thus permitting intensive development in, the Green Belt.

Further, Policy P2 states (para 4.3.19) that a Green Belt Supplementary Planning Document is being prepared, and that this document will provide further detail and guidelines to help inform development proposals. It is unacceptable that a policy of this sensitivity be promoted for final consultation without this detail.

The Plan is therefore not only non-compliant with the NPPF, but has not been positively prepared.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2766  Respondent: 10942081 / G J Teague  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7. Extension of the East Horsley village boundary

I object to this proposal.
The plan proposes that the area south of the A246, including the Warren, be included within the newly proposed "village boundary". This is unacceptable. Not only was this proposal not included in the earlier version of the plan put out for consultation in 2014, but no explanation is offered of the intended planning effect of this designation. The A246 is an obviously defensible boundary for the Green Belt. There appears to be no obvious purpose for creating this new village boundary other than a subterfuge to enable a future built environment of this area. No justification exists for removing the area south of the A246 from the Green Belt. The proposal is therefore in breach of the NPPF (para 83.)

This area south of the A246 has a true semi-rural character, evidenced by generous plot sizes, wide separations between dwellings and a uniformly lower density than that obtaining in the currently defined settlement area of East Horsley. All previous development in this area has (rightly) had to be consistent with maintaining the openness of the Green Belt, and ending this status would wreck its character and amenity. Even if it were to be accepted (which it is not - cf above) that the built environment within the existing settlement boundary of East Horsley was out of character with the overall openness of the Green Belt, this clearly is not true of the area south of the A246, which accordingly, should continue to be included in the Green Belt. To conclude otherwise would be to legitimate an obvious future "land grab" designed to enable wholly inappropriate development to the deep detriment of the existing residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2770   Respondent: 10942081 / G J Teague   Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8. Infilling (Policy P) Green Belt

I object to this policy.

Not only are the Horsleys to be removed from the Green Belt (cf above), but infilling is to be allowed within the identified settlement boundaries of "East Horsley (south)" as well as outside the inset boundaries, where it can be demonstrated that the site is as a matter of fact on the ground within the village (sic).

To the extent applicable to the area south of the A246, this proposal is completely unacceptable. Per the Council's own Guildford Borough Council Green Belt and Countryside Study Vol IV at para 13.13 the area south of the A246 is classified as a low development density. The infilling of "gaps", or "small-scale redevelopment of existing properties" (para 4.3.25 ff) in this area would utterly compromise the existing low density, and create a self fulfilling rationale for later formal insetting. This is little short of legalised vandalism.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2745   Respondent: 10942081 / G J Teague   Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
I write to record my strong objection to the draft Plan.

1. Regulation 18 Consultation Statement

Little account appears to have been taken of the concerns and objections raised in the most recent consultation in 2014. With regard to the multiple objections concerning the Horsleys, the Consultation Statement (p.163) states "These comments are considered to relate to the proposed sites .... and have been responded to in Planning for Sites." I am unable to find evidence of this response, or evidence of the specific objections raised in my letter of 19th September 2014 being included in the collated commentary (p.163 ff.)

I object to Policy S2. This states 12,426 as the total required, yet the supporting table called up by the policy sums to 9,810. This is prima facie evidence of the unsoundness of the plan. More generally, no effort has been made in the changed SHMA properly to take into account the reduced housing need consequent upon UK government's declared long term policy of reducing immigration, and thus forecast new household formation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to object to the new Guildford Local Plan:-

I do not believe there is good reason to consider East or West Horsley to be outside the Green Belt.

I do not think it is right to build such large numbers of houses in the green belt. The Green Belt is an important asset in the South East for environmental reasons. Once it is gone, it is gone forever.

Local infrastructure cannot support the proposed housing. Nor would I wish there to be extra infrastructure which in itself would spoil rural Green Belt land. New buildings such as schools are just as bad as new houses! Extra car parks are bad for the environment / flooding issues etc.

East Horsley is a village in a semi – rural area. It is not a farm and as such it cannot support the problems the plan would bring.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2506  Respondent: 10942433 / Brenda Ottaway  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed industrial development of 7,000 sq m at Garlick's Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available.

I object to the development at Garlick's Arch because the site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The site is also subject to flooding.

I object to building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.

I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is
currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2507  Respondent: 10942433 / Brenda Ottaway  Agent: 10942433 / Brenda Ottaway

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.

I object to the fact that 70% of the proposed 13,860 houses are targeting at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5562  Respondent: 10942433 / Brenda Ottaway  Agent: 10942433 / Brenda Ottaway

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of Send from the Green Belt.

I object to the building on the Green Belt at Send at Garlick's Arch, Clockbam Nurseries and Send Hill because

I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford's urban brownfield areas much closer to existing transport hubs.
I object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the (A247) would be gridlocked all day.

I object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25.

I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.

I object to the development at Garlick's Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks' notice and without any prior consultation and is not required in terms of housing need either for the village or the borough.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPA16/1273</th>
<th>Respondent:</th>
<th>10942625 / Fleur Ottaway</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.
I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<tr>
<th>Comment ID: PSLPA16/1116  Respondent: 10943137 / M Malthouse  Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<tr>
<td>I object to the plans to building more houses in the Horsley and Ockham area - we need to preserve the Green Belt.</td>
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<tr>
<td>We don't need any more houses as we are overloaded already with cars, shops, station, doctors and schools- We cannot cope with a whole influx of more houses- our needs are already too busy.</td>
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<td>I have lived in Horsley for over 50 years and have seen the expansion of all these facilities- more would be impossible.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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<td>I object to the lack of any evidence for the alleged housing need numbers</td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all erosion of the Green Belt, since this is the only safeguard from further air pollution.
I object to any "insetting" (i.e. removal) of any villages from the Green Belt I object to the disproportionate amount of development in one area of the Borough I object to the lack of any evidence for the alleged housing need numbers I object to the last minute inclusion of new sites with less than two weeks notice I object to the limited consultation period

Once the Green Belt is lost... it gone for ever. The Conservative election mandate was to SAVE THE GREEN BELT.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9722  Respondent: 10943265 / Barbara Ward  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9723  Respondent: 10943265 / Barbara Ward  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the disproportionate amount of development in one area of the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1347  Respondent: 10943265 / Barbara Ward  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the last minute inclusion of new sites with less than two 2 weeks notice I object to the limited consultation period

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2197  Respondent: 10943457 / Henry Benzikie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2205  Respondent: 10943457 / Henry Benzikie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I OBJECT** to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

**Comment ID:** PSLPA16/2191  **Respondent:** 10943457 / Henry Benzikie  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I OBJECT** to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever
since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.
The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 – 2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/4311</th>
<th>Respondent:</th>
<th>10943457 / Henry Benzikie</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I OBJECT** to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.
The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)
It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9299  Respondent: 10943457 / Henry Benzikie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9342  Respondent: 10943457 / Henry Benzikie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to Policy E1 - Development in designated rural areas

The policy should not apply to designated rural areas. The description of the Green Belt as a natural landscape is too vague and does not distinguish it from other areas of rural Green Belt. The development of sites in the villages should not be encouraged.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>PSLPP16/9287</th>
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I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9293  Respondent: 10943457 / Henry Benzikie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9360  Respondent: 10943457 / Henry Benzikie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk
of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/9336  **Respondent:** 10943457 / Henry Benzikie  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I OBJECT to Policy E7 Guildford Town Centre**

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.
The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/9323</th>
<th>Respondent: 10943457 / Henry Benzikie</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ( )</strong></td>
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<td><strong>I OBJECT to Policy H1 – Homes for all.</strong> Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.</td>
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<td>The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.</td>
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<td>I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.</td>
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<td>Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.</td>
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<td>It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.</td>
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<td>Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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Comment ID: PSLPP16/9329  Respondent: 10943457 / Henry Benzikie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9354  Respondent: 10943457 / Henry Benzikie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy 11. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.
Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9311  Respondent: 10943457 / Henry Benzikie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9317  Respondent: 10943457 / Henry Benzikie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9269  Respondent: 10943457 / Henry Benzikie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The
fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.)

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.
There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9275  Respondent: 10943457 / Henry Benzikie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9256  Respondent: 10943457 / Henry Benzikie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”.

Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

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The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN I re not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Respondent: 10943457 / Henry Benzikie</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1234
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1275  Respondent: 10943457 / Henry Benzikie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites-which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** SQLP16/1281  **Respondent:** 10943457 / Henry Benzikie  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/1207  **Respondent:** 10944065 / Freya and John Risdon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the removal of Send, Ripley and Clandon from the Green Belt because the villages and their countryside provide a necessary buffer between Woking and Guildford.

- I object to building on the Green Belt at Send at Garlick's Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded.
• I object to the exaggerated "housing need" figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

• I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas, much closer to existing transport hubs.

• I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough, Send has not been properly consulted and all its sites have been changed substantially.

• I object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the A247 would be gridlocked all day. I also object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25.

• I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including

• I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing. Roads, doctors’ surgeries and schools will be unable to cope.

• I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 and our road, Send Marsh Road, which are all already at 100% capacity especially during the rush hours.

• I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the

• The NPPF states that the presumption in favour of sustainable development "should be seen as a golden thread running through both plan-making and decision-taking." Standing at the head of the draft plan, Policy S1 ought to set a clear Instead, no definition of "sustainable development" is given.

• The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

• Please show my comments to the Planning Inspector, and please confirm receipt of my letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2201  Respondent: 10944065 / Freya and John Risdon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development at Garlick’s Arch because the stream which runs through that area ends up across the road from our house, in Send Marsh Road, and it has flooded in the past. The new development would increase the amount of run-off into the stream, by replacing soft, permeable, vegetated surfaces with new hard sw-faces, and therefore increase the risk of flooding downstream on Send Marsh Road. The development site also has a particular conservation sensitivity as it includes much old woodland. I believe trees which existed in the 16th century would be endangered. The site itself is also subject to flooding.
I also object to the development at Garlick's Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks' notice and without any prior consultation and is not required in terms of housing need either for the village or the borough. I object to the proposed industrial development of 7,000 sq m at Garlick's Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2906  Respondent: 10944065 / Freya and John Risdon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object to Policy A58 at Burnt Common because:
• It was deleted from the 2014 draft because of all the objections made previously.
• The word 'minimum' is a change from the previous 'maximum' in the 2016 plan and since that time there has been a decline in demand for industrial land.
• There is no need to build industrial or warehouse development in the middle of Green Belt when Slyfield and Guildford still have empty site and industrial units.
• The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 ha. for industrial land for the whole borough, not a huge over-allocation of 10 ha. at Send in the Green Belt.
• The impact on small surrounding roads will create traffic gridlock.
• It will join up existing villages and defeat the purpose of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2198  Respondent: 10944161 / Stephen Benzikie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2206  Respondent: 10944161 / Stephen Benzikie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2192  Respondent: 10944161 / Stephen Benzikie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 – 2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.
The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.
Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9300</th>
<th>Respondent: 10944161 / Stephen Benzikie</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9343   Respondent: 10944161 / Stephen Benzikie   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9349   Respondent: 10944161 / Stephen Benzikie   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9282   Respondent: 10944161 / Stephen Benzikie   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9288   Respondent: 10944161 / Stephen Benzikie   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9294  Respondent: 10944161 / Stephen Benzikie  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9361  Respondent: 10944161 / Stephen Benzikie  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6
I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/”Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in-price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9324 Respondent: 10944161 / Stephen Benzikie Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University,
which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/9330  **Respondent:** 10944161 / Stephen Benzikie  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I OBJECT** to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/9355  **Respondent:** 10944161 / Stephen Benzikie  **Agent:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations were available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being “closely related”. In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure...
will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<thead>
<tr>
<th>Comment ID: PSLPP16/9312</th>
<th>Respondent: 10944161 / Stephen Benzikie</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have
considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/9318  **Respondent:** 10944161 / Stephen Benzikie  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**I OBJECT** to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/9270  **Respondent:** 10944161 / Stephen Benzikie  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**I OBJECT** to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public
consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt.
There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/9276  **Respondent:** 10944161 / Stephen Benzikie  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/9257  **Respondent:** 10944161 / Stephen Benzikie  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/9263  **Respondent:** 10944161 / Stephen Benzikie  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**I OBJECT** to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”.

Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

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The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1264  Respondent: 10944161 / Stephen Benzikie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1270  Respondent: 10944161 / Stephen Benzikie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1276  Respondent: 10944161 / Stephen Benzikie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites-which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
**Comment ID:** SQLP16/1282  **Respondent:** 10944161 / Stephen Benzikie  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

**I do not consider** the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/4586  **Respondent:** 10944385 / Clare Benzikie  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

**C.i. Policy 25 Gosden Hill – My Objections**

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt.

4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity.

5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.

7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).

8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

C.i. Policy A43 Garlick’s Arch – My Objections

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.
21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4589  Respondent: 10944385 / Clare Benzikie  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

C.iii. Policy A58 Burnt Common – My Objections

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

I object to the potential impact of para 4.4.23a on Burnt Common with its over allocation of industrial zoning is subterfuge for a waste management facility which is a dishonest and underhand approach to planning and proper consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
E. Policy S1 Presumption in favour of Sustainable Development– My Objections

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  

Comment ID: pslp17q/597  Respondent: 10944385 / Clare Benzikie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

G. Duty to Cooperate – My Objections

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to cooperate with the wishes of its own electorate.

Despite the thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  

Comment ID: pslp173/248  Respondent: 10944513 / Amber Ellis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/249  Respondent: 10944513 / Amber Ellis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

• The “objectively assessed need” figure of 693 homes a year is too high.
• A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
• The current SHMA inflates the proposed housing figure due to
  ◦ failure to correct for errors in the historical data for international migration flows,
  ◦ issues with the way it considers students and affordability and
  ◦ flaws in the method for estimating the number of homes needed to support job growth.
• It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2198  Respondent: 10944513 / Amber Ellis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 – 2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).
The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.
I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/665  Respondent: 10944513 / Amber Ellis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/666  Respondent: 10944513 / Amber Ellis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/672  Respondent: 10944513 / Amber Ellis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students IRE accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.
Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/673  Respondent: 10944513 / Amber Ellis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/678  Respondent: 10944513 / Amber Ellis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to
court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy II1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Respondent: 10944513 / Amber Ellis</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID3</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I OBJECT to poor air quality concerns (Policy I3)</td>
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<td>Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.</td>
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<th>Comment ID: pslp171/3286</th>
<th>Respondent: 10944513 / Amber Ellis</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P4</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/84  Respondent: 10944513 / Amber Ellis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 2: Legal Compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/85  Respondent: 10944513 / Amber Ellis  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

5. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

6. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

7. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

8. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

9. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation

10. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation

11. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound

12. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018

13. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars

14. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham

Page 1281 of 2167
The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp17q/86  **Respondent:** 10944513 / Amber Ellis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites **as a whole** has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.
Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3161  Respondent: 10944961 / Margaret Prevost  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Proposed Submission Local Plan - Site Policy A35, A36, A38, A39, A40, A41

My wife and I are resident at [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

The B 2039 Ockham Road North/South is already being used like an A road! The structure of the road is not suitable for the current volume of cars, heavy goods vehicles and coaches which has increased dramatically since we arrived here in 2017. If 500+ new houses are built in the Horsleys alone the result will be unbearable. If the so called Wisley Airfield plan was also allowed the result would be absolute chaos.

Our local schools, the Horsley Medical Centre, the Horsley railway station car park and the parking facilities at the 2 shopping areas are already operating at maximum capacity.

There do not appear to be any proposals which would address these problems.

The inclusion of these sites in the proposed local plan is therefore contrary to Policy 13 (Suitable Transport for new developments) and Policy 11 (Infrastructure and Delivery).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3213  Respondent: 10944961 / Margaret Prevost  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North
My wife and I are resident at [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

The B 2039 Ockham Road North/South is already being used like an A road! The structure of the road is not suitable for the current volume of cars, heavy goods vehicles and coaches which has increased dramatically since we arrived here in 2017. If 500+ new houses are built in the Horsleys alone the result will be unbearable. If the so called Wisley Airfield plan was also allowed the result would be absolute chaos.

Our local schools, the Horsley Medical Centre, the Horsley railway station car park and the parking facilities at the 2 shopping areas are already operating at maximum capacity.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to Policy A25 Gosden Hill as being totally a inappropriate and unsustainable development of 2000 homes in the Green Belt which will cause coalescence and urban sprawl from Burpham to West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6789   Respondent: 10945057 / Margaret Field   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.

2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.

3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

7. Our Queen’s speech at the opening of Parliament one month ago our queen said “a promise to ensure transport and buses will not be reduced and this would be for the Mayor to ensure” - proposed local bus services have been proposed locally and now we hear the same for many train services.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

- I object to all the proposals mentioned above and we feel because of the result of the recent Referendum result it is imperative for the Guildford Borough Council to go “back to the drawing board” to reassess the numbers of properties which would be needed within Surrey together with providing information on infrastructure and additional facilities required. These numbers of properties required will certainly be extremely different to the calculations made before the Referendum!

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7410  Respondent: 10945057 / Margaret Field  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the GreenBelt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7405  Respondent: 10945057 / Margaret Field  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of strategic site Policy A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7409  Respondent: 10945057 / Margaret Field  Agent:
### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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1. I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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### Comment ID: PSLPS16/7406  Respondent: 10945057 / Margaret Field  Agent:

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1. I OBJECT to Policy A43a, the proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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### Comment ID: PSLPS16/7408  Respondent: 10945057 / Margaret Field  Agent:

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1. I OBJECT to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/7407  Respondent: 10945057 / Margaret Field  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to Policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16473  Respondent: 10945057 / Margaret Field  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16470  Respondent: 10945057 / Margaret Field  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
### Comment ID: PSLPP16/16472  
**Respondent:** 10945057 / Margaret Field  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: PSLPA16/668  
**Respondent:** 10945537 / Neill Ebers  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

We write with reference to the new local plans for further housing in East & West Horsley ('The Horsleys'). The plans, as we understand them, are for the The Horsleys to have 533 new houses introduce into the area as well as 2,000 new housing development of the Wisley Airfield. Should our understanding be correct then you are looking to introduce 2,533 new houses into an area spanning 3 miles around The Horsleys.

We are unsure if you have experienced the congestion on the A3 between Guildford and the M25 (JJO) junction turn off at Wisley. The congestion starts from 6.30am in the morning until around 9am and then starts again from 4.30pm until around 7pm with the tail back on some days going back a couple of miles. The A3 and the surrounding area are already experiencing difficulties in handling the existing traffic volumes which will only increase with the proposed new housing.

Outside of the traffic congestions mentioned above we are of the belief the following impacts will be felt to the area:
1. Further road blockage around the surrounding areas of The Horsleys.
2. A further taxation on the children capacity and resources of the local schools.
3. Reduced packing spaces (which has already become a problem).
4. Additional pollution to the area.
5. An impact to the Green Belt status of the area.
6. More accidents in the area.
7. A further drain on the NHS resources in the area (which are already stretched).
8. The potential devaluation of house prices.

We were attracted to the Horsley area some 10 years ago because of its' accessibility, beauty, schooling availability and the local community & village. We have seen a number of changes over the years most of which have been negative, we believe what you are proposing will be of further detriment to the place we originally fell in love with and will negatively impact our young family.

We oppose your plans and wish our objections to be noted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2545  Respondent: 10945537 / Neill Ebers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We are of the understanding that revisions have been made to the local plans for further housing in East & West Horsley ('The Horsleys') as well as to the housing development of the land at Wisley Airfield. We understand that amended permission has now been requested for a new settlement of up to 2,068 dwellings incorporating up to 60 sheltered accommodation units and associated infrastructure including accesses onto the A3 (Ockham Interchange). Ockham Lane and Old Lane and revised access to Elm Corner, a primary/secondary school, community provisions, nursery provision, health facility, a local centre, employment area, 8 traveller pitches, sports and recreational facilities amongst a host of other things.

Considerable congestion is already being experienced on the A3 between Guildford and the M25 (J10) junction turn off at Wisley. The congestion starts from 6.30am until around 9am and then starts again from 4.30pm until around 7pm with the tail back on some days going back a couple of miles. The A3 and the surrounding area are already experiencing difficulties in handling the existing traffic volumes which will only increase with the proposed new housing.

Outside of the traffic congestions mentioned above we are of the belief that these amended plans will be felt in surrounding areas such as The Horsleys and Ripley and will generate the following impacts:
1. Further road blockage around the surrounding areas of The Horsleys and Ripley
2. Will increase the strain on the local schools in the area.
3. Reduced packing spaces (which has already become a problem).
4. Additional pollution to the area.
5. An impact to the Green Belt status of the area.
6. More accidents in the area.
7 A further drain on the NHS resources in the area (which are already stretched).
8. The potential devaluation of house prices.
Should our understanding be correct of what we believe are the amended plans we hereby wish to make our objections known with respect to these amended plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLP16/363  **Respondent:** 10945793 / JN Boardman  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

What the Local Plan has not taken into account is: "The local typography which does not permit change?"

TO SINK: due to Subsidence
Sendmarsh sits on a very deep clay bowl.

Which means that any structures built on this vast amount of clay will need foundations that withstand shrinkage and movement. Sadly this was not the case when Wimpy built their estate on Sendmarsh during the late 1960's- early 1970's.

The consistency of this clay has been maintained by Mother Nature, for thousands of years, any changes to this statuesque (water content) will cause structural failures within the Wimpy Estate and the surrounding area structures.

I therefore object to the "Planning moves to build over Burnt Common and other areas surrounding Send.marsh." This will greatly affect the clays natural structural. In effect: by concreting over the Green Belt fields, which are the collection points for rain water. This waters peculate down into the ground resulting in ground water. In other words; it's this water which keeps the clay in a state of balance and the structures that now sit on it.

TO SWIM: due to Flooding
Sendmarsh is on the cuff of flooding.

Throughout the area, East Clandon Stream flows. Water flows passed Send.marsh at depth of 2 to 3 inches & upwards of 10 to 12 feet.

A flood barrier was put in place around Send.marsh in 2006-8. In winter 2014/15, water levels were within 2 feet from the top of this barrier. Having Burnt Common along with the surrounding areas; concreted over: will increase water run-off into the East Clandon Stream making flooding inevitable & repetitive.

The double whammy comes from both of the above and will result in: -

1. Home Insurance costs rising due to:
   1. Long term subsidence's problems.
   2. Short & long term flooding issues.
2. Property values for Send Marsh will drop.
Until all these issues are fully resolved and solutions put in place, both politically & technically; no planning approval should be given.

I object to; tweaks in the local highways infrastructure; which will not match the vast increases in motor transport; caused by this "Massive Proposed Development."

This Local Plan does not come close to any relevant meaning of word "Plan," in fact it only reflects gloss of a politics!

I object totally to The Local Plan because, it does away with the "Green Belt" It also tramples over most, if not all, of the current & future, electorates' wishes.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Respondent:</th>
<th>10945793 / JN Boardman</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

This Local Plan does not come close to meaning of the word "Plan," in fact it's main thrust reflects the gloss of political short-termism!

Even before "The Plan," is considered, the current and existing issues need to be resolved.

Road infrastructures:
- Currently, there is not one feeder road onto or away from the A3, which does not have a bottle neck.
- Many with these issues are within a couple of miles from the A 50 proposal.
- Most of these roads are just historic lanes; having been tweaked & tarmac covered.
- Where are the planned improvements & changes for these side roads?
- Under the A58 multi directional traffic flow; it must be proven that both, getting onto or off the A3 will be affective & efferent over time. Not just a quick fix.

Environment Footprint:
- Increases in house building, Warehouses etc .. along with all infrastructural changes; all will dramatically impact on the environmental foot print.
- This will not just happen locally around the Send Area but, also be long & lasting.
- There is nothing in "The Plan," that addresses this issue.
- There must be a better way & a better plan.

Ecology Damage:
- Most of the land, nominated under "The Plan," is currently green belt country side; nothing seems to have been put down for what needs to be protected the ecology & how this must be done.
Pollutants:
- Air pollution, Noise & Lighting are impacts that must be understood and addressed as current & increasing problems
- Until such time as these are fully understood & resolved, with solutions in place, politically, environmentally & technically; no planning approval should be given.

I object to; tweaks in the local highways infrastructure; which will not match the vast increases in motorised transport due to this "Massive Proposed Development."

I totally object to The Local Plan, Strategy and Sites June 2017 because, it does away with the "Green Belt." It tramples over most, if not all of the local electorates wishes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3367  Respondent: 10946177 / Graeme Verra  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As residents of East Horsley, we object to the Local Plan for the reasons outlined below.
I firstly note our objections to the previous Local Plan in 2014 have not been addressed in any material way and therefore still stand. I look forward to seeing the feedback on this revised plan being used constructively.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3368  Respondent: 10946177 / Graeme Verra  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

DEVELOPMENT IN EAST AND WEST HORSLEY
The proposal to develop nearly 600 houses in East and West Horsley would place an unsustainable burden on the local facilities and infrastructure including schools, roads and other essential local facilities needed by the community. Many of these are already being used at full capacity. Also as was clearly demonstrated at the start of 2014 when the area experienced flooding including road closures, any additional development would exacerbate these problems. The designation of Station Parade as a “District Centre” falsely represents its status and seems designed to justify other
proposals in the Local Plan. The resignation is spurious and should be rejected. We also note that the target outlined represents a 25% increase in the housing stock of the borough, which is in excess of the Office of National Statistics (“ONS”) projection of a population increase of 15% for Guildford Borough over this same period. The proposal to change the Settlement Boundaries to include additional housing must therefore be rejected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13718  Respondent: 10946177 / Graeme Verra  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

GREEN BELT
The Green Belt was established principally to protect London and the south east area from unrestricted urban spread. This has been successful and ensured that historic towns and villages have largely retained their distinctive nature. Perhaps most critically, it provides a safeguard to the countryside which is increasingly under threat. Having the Green Belt provides both recreational opportunities for people living in the surrounding urban areas as well as being the lungs of our ever increasingly built up environment. We are stunned that when we are placing globally such a high priority on what is happening to our environment that nothing short of vandalism of the Green Belt is being considered. Nearly two thirds of the proposed developments will be made on Green Belt land. The Green Belt must remain intact with its existing boundaries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13719  Respondent: 10946177 / Graeme Verra  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

PROPOSED DEVELOPMENT AT OCKHAM
This would have a major adverse impact on the surrounding area putting additional strain on infrastructure and local facilities. One simple example being the A3 which now is at a standstill in the Ockham area at the times many people need to travel. The roads to local stations are similarly overloaded. There appears to be no serious consideration of the impact of such a major development on local infrastructure. The same detrimental impact would be felt on medical, school and other
services. This and the proposed developments at Burnt Common and Gosden Hill, and Burpham must be rejected because of their wider impact.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1598  Respondent: 10946177 / Graeme Verra  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- The impact on already stretched local facilities, infrastructure and services that would result from the plan is not addressed to any satisfactory level within the plan and therefore makes the plan unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2100  Respondent: 10946561 / Frances Julian  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the number of new houses proposed for Send. The number seems to have increased since 2014
2. I object to the green belt being built on, there is plenty of room on the brownfield sites
3. I object to policy P2
4. I object to policy A43 to build new houses in a conservation area around Burnt Common
5. A44 – I object to building on green belt land. The land is already filled with documented unsafe land filled waste. So very very unsuitable to build on. No way is there sufficient access by road. Send will become gridlocked.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4520  Respondent: 10946721 / Gillian Allen  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

| 1. | I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much. |
| 2. | There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. |
| 3. | Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt. |
| 4. | The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity. |
| 5. | The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford. |
| 6. | The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon. |
| 7. | I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below). |
| 8. | The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools. |
| 9. | A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km. |

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4522  Respondent: 10946721 / Gillian Allen  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

| 1. | I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches. |
| 2. | It ignores all the thousands of previous objections made by local people. |
| 3. | There is no proven demand for travelling show people plots in this location. |
| 4. | There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints. |
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.

6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.

7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.
18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site.

2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.

3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt increase tail backs on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPA16/2986  Respondent:  10947105 / Brenda Shaw  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate?  ( ), is Sound?  ( ), is Legally Compliant?  ( )

Answer (if comment is on questions 1-7 of the questionnaire):  ()

We object to the Proposed Submission Local Plan which Guildford Borough Council GBC has now published for public consultation on the grounds articulated and submitted by East Horsley Parish Council, the East Horsley Action Group, Guildford Green Belt Group and Horsley Countryside Preservation Society, which we fully support.

We are concerned that the infrastructure proposals are inadequate even to meet the needs of what is there at the moment, let alone the proposed developments in the Local Plan. The current infrastructure and facilities around the Horsleys barely cope with current demand to support the local population and it seems that the proposed changes to infrastructure will do little if anything to ease this, let alone cope with an increased population resulting from the excessive number of new houses proposed in the area.

The roads and pavements in the Horsleys area are inadequate, the roads are narrow and there are no pavements along large stretches of roads. For example, the Ockham Road (North and South) is one of the main roads in the Horsleys; this road and the pavements are already dangerous due to the road and pavement widths and the large number of large vehicles (lorries, vans, buses etc) which travel at speed along this road. The proposed alarming increase in housing will only exacerbate this dangerous situation.

The Local Plan's proposed increase in the number of new houses in the Horsleys is quite alarming and the resulting increase in population cannot be supported in this area.

We sincerely request that GBC radically re-assess its own policy objectives rather than force through the Council a Local Plan which clearly does not have the wider support of the residents of Guildford Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPA16/3057  Respondent:  10947169 / Gordon Shaw  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North
We object to the Proposed Submission Local Plan which Guildford Borough Council GBC has now published for public consultation on the grounds articulated and submitted by East Horsley Parish Council, the East Horsley Action Group, Guildford Green Belt Group and Horsley Countryside Preservation Society, which we fully support.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Keep us on the Green Belt please

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/31  Respondent: 10947265 / M.T. Peponis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I live in Send village and I object to Clock Barn Nursery (Tannery Lane policy) A42 for 60 home (33% more). I objected before when it was 45 and object 33% more now. It makes traffic worse for me in Tannery Lane and A247 junction, I use Tannery Lane several times a week and I’m registered disabled. I object to use of the green belt I’ve lived in for 72 years.

I object to Garlicks Arch (Send, Marsh) (Policy A43) 400 homes and gypsies – [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]. It will restrict my access and I do not want travellers moving in – I have written before about this to object. It will spoil out semi rural village – my mother pushed my pram down Kiln Lane and it is a famous beauty spot – with blue bells in spring. We want to be separate to Ripley and remain green belt – I will no longer have such clean access with traffic and feel [unreadable words] from where they used shot and kill birds. I want it left green belt.

Burnt Common (Policy A58) London Road I object and understand a warehouse – wasn’t this already put aside? This should be green belt. It should link up to existing sites at Slyfield – Guildford where there is space left.

It will cause heavy traffic and I rely on use of Dr [unreadable word] at send and use this road for me and my husbands serious medical condition – we are both registered disabled. Again it links up what is best left separate.

Green belt – Policy 2 (p: 4.3-15) again it had been deleted in 2014 (whats’ going on here!) why was it changed from Max to Min in 2016 plan – can’t believe you propose a business park. This should remain green belt. It [unreadable word] such over use of roads: there are MANY other places that are not already ones lived. What used to take me 8 minutes and get you to the Surrey [unreadable word] now could take one ½ hour. Often losing the beauty of the green belt for the unnecessary greed of property developers.

Please leave our villages alone.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/614  Respondent: 10948161 / Hugh Bowen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty 
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt increase tail backs on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/6869</th>
<th>Respondent: 10948225 / Roy Buosi</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPA16/76  Respondent: 10949601 / Victoria Parker  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Lack of proper infrastructure planning for sites
   I object to the lack of planning and implementation of infrastructure. For example at Garlick’s Arch. Without improvements to the infrastructure prior to development, the existing residents’ quality of life will significantly deteriorate in many ways. How will the local services such as doctors and schools cope?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/208  Respondent: 10949601 / Victoria Parker  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Disproportionate size of sites in relation to rural locations
   I object to the allocation of land to the strategic sites of Wisley Airfield AGAIN!!!, Garlicks Arch (Ripley/Send border) and Gosden Hill (Clandon). The proposed development of these sites will have a disproportionate impact on the surrounding local villages. They will have a permanent impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/210  Respondent: 10949601 / Victoria Parker  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **Congestion on the trunk roads, A3/M25**
   I object to the development of the strategic sites due to A3 and M25 already being at capacity during peak hours. Highways England has no plans to look at improving the A3 before 2020. It is therefore not sustainable to identify sites for further development which will worsen the congestion on these motorways and trunk roads.

2. **Congestion on the local village roads and lanes**
   Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. I object to further development which will cause greater congestion in and around our villages.

3. **Unsuitability of our local roads for heavy vehicles and more traffic**
   Many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

4. **Poor air quality concerns**
   Further congestion, particularly in built up residential areas will only lead to greater levels of air pollution. I object to further development, which will result a fall in the air quality.

1. **Lack of Utilities Capacity**
   Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. I object to the development of Garlick’s Arch on the ground that there is little capacity in these networks.

2. **Sites being planned in unsustainable locations**
   Many of the strategic sites e.g. Wisley Airfield and Garlick’s Arch, are in unsustainable locations. They do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. I object on the grounds that these sites are not sustainable.

3. **Parking issues in local villages caused by larger population**
   Many of the affected villages, such as Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems. To which I object.

4. **Local healthcare facilities will be overwhelmed**
   Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. I object due to the further stress it will put upon existing health services.

5. **Local policing facilities will be overwhelmed**
   Police services are seeing funding reduced. The development of the likes of Garlick’s Arch and Wisley Airfield will stretch the police services further and I object.

6. **Local social welfare facilities will be overwhelmed**

7. **Local shops/restaurant facilities will be overwhelmed**

8. **No protection of heritage assets**

9. **No protection of the environment**

10. **Overdevelopment of sites. I object to the existing overdevelopment of Ripley - it is a small village and should remain so**

11. **Not meeting the needs of local communities.** I object to the fact that you seem to insist on ignoring what the local communities are telling you. We pay to live here - you need to start listening

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I wish to make the following objections to the local plan

1. Not protecting the Green Belt
   I object to the proposals to remove Ripley, Send and Clandon from the Greenbelt. There are absolutely no special circumstances to do this. Once taken the green belt is lost forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. Unbalanced allocation of development in one area of the Borough
   Between the M25 and Burpham, a distance of only about 5 miles it is proposed that over 6,500 houses are built. This represents over 40% of the housing proposed in the Local Plan. I object to this area being hit so hard by the allocation of development, which is disproportionate to the rest of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to removal of Brownfield site (A34) from the Plan

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3088  Respondent: 10949601 / Victoria Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to removal of Brownfield sites (A4) from the Plan

Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3085  Respondent: 10949601 / Victoria Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the allocation of 6 Traveling Showpeople sites in A34 Garlick’s Arch

The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlicks Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.

1. The Plan is self-inconsistent in respect of traveller sites.

A50 Whittles Drive, Normandy, shows on the Site details: “Allocation: The site is allocated for approximately 14 Travelling Showpeople plots ...” Clearly A50 more than covers the total "need" of 8, (page 40, 4.2.22.) and so no “need” exists for this in site A43. This and other inconsistencies in the Plan mean no decision can be made on the basis of this document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3087  Respondent: 10949601 / Victoria Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the hiding of development by “deferment” (A24, A25, A26, A43)

This version of the Plan has concealed some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects:

i) to hide the number of housed actually being built (A24, A25, A26 – total of 1100 deferred, but still being built!), and

ii) give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.

I object to the hiding of development by “deferment” (A24, A25, A26, A43)

This version of the Plan has concealed some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects:

i) to hide the number of housed actually being built (A24, A25, A26 – total of 1100 deferred, but still being built!), and

ii) give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.

I object to the potential and ill-defined increase in housing allocation at A43 ***Garlick’s Arch

The potential of an increase from 400 houses at site A43 Garlick’s Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages.

I object to the unfair imbalance of the Plan across the borough.

With the removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan has become even more biased against the North East of the borough. Guildford Borough is over 100 square miles. Of the 11,350 homes proposed in the Plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3092  Respondent: 10949601 / Victoria Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the lack of proper infrastructure planning for sites (A43 and A42)

The Foreword to the plan by Paul Spooner includes on page 5:

"We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan."

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

I wish these objections to be fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3091  Respondent: 10949601 / Victoria Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the proposal for a Waste Management Facility in Green Belt (A58)

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1414  Respondent: 10949601 / Victoria Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit IS to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1412  Respondent: 10949601 / Victoria Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the extended development in the Green Belt (Policy P2, Site A43)

I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1415  Respondent: 10949601 / Victoria Parker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object removing Send Business Park from the Green Belt (4.3.15).

Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/278  Respondent: 10949729 / Ivan Szabo-Toth  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I am objecting to the local plan for Send, Send Marsh and Burnt Common. I object to the number of houses that the plan intends to deliver (693 per annum) and in particular Garlick's Arch(Policy A43) and the development of 2000 homes at Gosden Hill Farm Merrow.- Policy A25 .I also object to the 2 new A3 sliproads at the A247 clandon road (Policy A43A)

I object as this is in clear contravention of the central governments stated commitment for Green belt protection. I also object because the local infrastructure (medical,schools,roads,transport) etc is already stretched to breaking point and will not support the further development in the local plan.

Regards
Ivan Szabo-Toth

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to Policy A43, Land at Garlick’s Arch Send Marsh, because it will cause overdevelopment to the local area and will generate a level of traffic which the village cannot cope with. The village already struggles to cope with existing traffic levels.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

- I object to Policy A58 Land at Burnt Common, London Road because there is no need to build industrial or warehouse developments in the green belt where other brown field sites are available in Guildford and Slyfield.

Overall in my opinion the council needs to have more respect for green belt and focus on brown belt sites. Also in Send the existing traffic levels are already at breaking point.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed Infrastructure Schedule (Appendix C) There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the figure of 693 houses per annum in the borough being too high (Appendix D) GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to development in areas at risk of flooding (Policy P4) The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land at Garlicks Arch, Send Marsh/Burnt Common and Ripley (A43) Garlick's Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the the Draft Local Plan Infrastructure schedule does not provide for this site at all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a) This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3). Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6471  Respondent: 10949921 / Jan Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5). The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6465  Respondent: 10949921 / Jan Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6466  Respondent: 10949921 / Jan Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of proper infrastructure planning for sites (Policy I1) The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18661  Respondent: 10949921 / Jan Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Congestion on the trunk roads, A3/M25
   I object to the development of the strategic sites due to A3 and M25 already being at capacity during peak hours. Highways England has no plans to look at improving the A3 before 2020. It is therefore not sustainable to identify sites for further development which will worsen the congestion on these motorways and trunk roads.

2. Congestion on the local village roads and lanes
   Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. I object to further development which will cause greater congestion in and around our villages.

3. Unsuitability of our local roads for heavy vehicles and more traffic
   Many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

4. Poor air quality concerns
   Further congestion, particularly in built up residential areas will only lead to greater levels of air pollution. I object to further development, which will result a fall in the air quality.

5. Lack of proper infrastructure planning for sites
   I object to the lack of planning and implementation of infrastructure. For example at Garlick’s Arch. Without improvements to the infrastructure prior to development, the existing residents’ quality of life will significantly deteriorate in many ways. How will the local services such as doctors and schools cope?

6. Lack of Utilities Capacity
   Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. I object to the development of Garlick’s Arch on the ground that there is little capacity in these networks.

7. Sites being planned in unsustainable locations
   Many of the strategic sites e.g. Wisley Airfield and Garlick’s Arch, are in unsustainable locations. They do not benefit from railway stations within easy walking distance and bus services across rural villages are forever
8. **Parking issues in local villages caused by larger population**
Many of the affected villages, such as Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems. To which I object.

9. **Local healthcare facilities will be overwhelmed**
Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. I object due to the further stress it will put upon existing health services.

10. **Local policing facilities will be overwhelmed**
Police services are seeing funding reduced. The development of the likes of Garlick’s Arch and Wisley Airfield will stretch the police services further and I object.

11. **Local social welfare facilities will be overwhelmed**

12. **Local shops/restaurant facilities will be overwhelmed**

13. **No protection of heritage assets**

14. **No protection of the environment**

15. **Overdevelopment of sites. I object to the existing overdevelopment of Ripley - it is a small village and should remain so**

16. **Not meeting the needs of local communities.** I object to the fact that you seem to insist on ignoring what the local communities are telling you. We pay to live here - you need to start listening.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**  

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**Comment ID:** PSLPP16/6470  **Respondent:** 10949921 / Jan Parker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to poor air quality concerns (Policy 13) The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

I object to the congestion that development will cause to the trunk roads A3/M25 (Policy12) Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.

Please record these objections individually against the relevant sections of the plan and ensure that they are submitted to the Planning.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **Not protecting the Green Belt**
   I object to the proposals to remove Ripley, Send and Clandon from the Greenbelt. There are absolutely no special circumstances to do this. Once taken the green belt is lost forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/83  Respondent: 10949921 / Jan Parker  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **Disproportionate size of sites in relation to rural locations**
   I object to the allocation of land to the strategic sites of Wisley Airfield AGAIN!!!, Garlicks Arch (Ripley/Send border) and Gosden Hill (Clandon). The proposed development of these sites will have a disproportionate impact on the surrounding local villages. They will have a permanent impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6463  Respondent: 10949921 / Jan Parker  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to not protecting the Green Belt (Policy P2) I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43) There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/6472  Respondent: 10949921 / Jan Parker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Send Village being removed from the Green Belt – this provides an essential landscape to stop Woking and Guildford from becoming some massive urban scrawl. Local Councillors and central government gave a clear election promise to protect the Green Belt – and this renages on it. Send has already lost a lot of natural vegetation to small / medium developments and these latest proposals are far too much for a village location causing more strain on roads, schools and doctors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/84  Respondent: 10949921 / Jan Parker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **Unbalanced allocation of development in one area of the Borough**
   
   Between the M25 and Burpham, a distance of only about 5 miles it is proposed that over 6,500 houses are built. This represents over 40% of the housing proposed in the Local Plan. I object to this area being hit so hard by the allocation of development, which is disproportionate to the rest of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6467  Respondent: 10949921 / Jan Parker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The increase in housing numbers from 45 to 60 at Site A42 in Tannery Lane, Send will have a significant impact on the already highly congested local rural road network around and within Ripley. This is in contradiction to section 2.14a of the Plan which states “Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays.” And yet there is no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I hereby wish to object to the amendments to the Local Plan having already objected to the original local Plan for many reasons, including the following:-

- Any development at **Site A43 Garlicks Arch** would be on Green Belt land, and there is no identified or exceptional need within the Local Plan documentation.
- The inclusion of 6 Travelling Showpeople plots with associated storage facilities is entirely inappropriate in a rural environment within the Green Belt and there is no identified need within the Local Plan.
- The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. The Plan is self-inconsistent and therefore not properly constituted.
- The potential of an increase from 400 houses at site A43 Garlicks Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages. The plan states that “if the [Traveller sites] remains unsold, the future use of the land should have regard to an up to date Traveller Accommodation Assessment (TAA) and Strategic Housing Market Assessment (SHMA), with specific consideration of the use of the land for affordable housing”. So even more travellers pitches and houses, which is unjustified.
- Section 4.2.22 of the Plan states that “Sufficient sites are identified within the Local Plan [for] 8 plots for Travelling Showpeople” So why do 75% of them have to be in Ripley? This is unbalanced and unfair.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/1817  **Respondent:** 10949921 / Jan Parker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the allocation of 6 Traveling Showpeople sites in A34 Garlick’s Arch

The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlicks Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/1818  **Respondent:** 10949921 / Jan Parker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Plan is self-inconsistent in respect of traveller sites.
A50 Whittles Drive, Normandy, shows on the Site details: “Allocation: The site is allocated for approximately 14 Travelling Showpeople plots ...” Clearly A50 more than covers the total “need” of 8, (page 40, 4.2.22.) and so no “need” exists for this in site A43. This and other inconsistencies in the Plan mean no decision can be made on the basis of this document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1822  Respondent: 10949921 / Jan Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the hiding of development by “deferment” (A24, A25, A26, A43)

This version of the Plan has concealed some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects:
i) to hide the number of housed actually being built (A24, A25, A26 – total of 1100 deferred, but still being built!), and
ii) give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5  Respondent: 10949921 / Jan Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• The removal of site A46 from the Plan (with its proposed 1100 houses) has left the Plan even further unbalanced against the North East of the Borough with over 40% of the development proposed in this small area of Green Belt
• The potential for a substantial increase in industrial floorspace from 7000 sq m to an unspecified amount at the site A58 Burnt Common does not provide local residents with enough information for a full and proper consultation given the ambiguity and lack of detail within the document

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The potential for a substantial increase in industrial floorspace from 7000 sq m to an unspecified amount at the site A58 Burnt Common does not provide local residents with enough information for a full and proper consultation given the ambiguity and lack of detail within the document.

· The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a and does not allow for full and proper consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

The inclusion of site A58 Burt Common, removes the need for A43 Garlick’s Arch)

GBC’s own reasons for including Garlick’s Arch A43 in the 2016 version were

1. *The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm, ... (site allocation A25) [than the Burnt Common site did]*”
2. *The site [A43] provides the employment floorspace needed in the plan to help meet identified needs”*

Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (which are almost contiguous) are in the plan; therefore GBC are not following their own guidelines and objectives.

Since A58 Burnt Common is now in the Plan (2017) more than the “required” industrial space is available there, so there is no reason for Garlick’s Arch to be included.
I object to removal

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/536  Respondent: 10949921 / Jan Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the extended development in the Green Belt (Policy P2, Site A43)

I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9617  Respondent: 10949985 / Charlotte Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is in the interests of any future decision to be made by the Planning Inspector that he fully appreciates the strength of opposition to the above.

It is all well and good for bureaucratic individuals, with no local knowledge of the full effect of decisions they may wish to make, to act contrary to the wishes of a majority of local residents when all they these ill advised bureaucrats have in mind is increasing the area of land available for development whilst ignoring amongst other matters:

1. Unacceptable escalation of traffic flow creating unwarranted air pollution.
2. Lack of availability of the necessary schooling facilities.
3. Stretching medical facilities already at breaking point.
4. The lack of local retail shop and other facilities to accommodate any resulting increase in the local population.

All in all the Council have failed miserably in adopting an objective approach to what is being proposed and even more than that have failed to demonstrate the exceptional circumstances which are surely necessary before the boundaries are
extended for the purpose they have in mind.

It is time to look at the matter in the light of the year 2016 and in the light of the recent wishes of the majority of the electorate which has cast a doubt over the interest of builders in large residential development commensurate to this area of Surrey until the future becomes more stable within the housing market and if for no other reason the proposal should be shelved.

Please ensure these views are made available to the Inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/2969  **Respondent:** 10950273 / Stuart McDonald  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This calculation is disproportionate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/6058  **Respondent:** 10950273 / Stuart McDonald  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs. This would impact also on the flooding issues that this area suffers from.

- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The statement that the development will result in a cycling and walking rather than the use of cars. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
2. The increased volume of car traffic.
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements. These roads flood when it rains heavily.
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
5. The increase in the already severe congestion on the A3 and M25 particularly around Wisley and Painshill junctions.
6. The lack of suitable public transport.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site.
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels.
- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. My family and I enjoy living in Ockham because of the access to the countryside and clean air and the peace and quiet afforded by wide open spaces. I wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.
- I object to the continued inclusion of the former Wisley Airfield, - now known as Three Farm Meadows because the planning application has already been unanimously rejected by GBC’s Planning Committee.
- I object because there is already a shortage of schools in this and surrounding areas due to lack of planning by the Council and this situation will only worsen as a result of these plans. Our children are the future and we should be doing all we can to ensure they all receive the very best education. The schools planned would not be sufficient.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6092  Respondent: 10950273 / Stuart McDonald  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. No exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs. This would impact also on the flooding issues that this area suffers from.
- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The statement that the development will result in a cycling and walking rather than the use of cars. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
  2. The increased volume of car traffic.
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements. These roads flood when it rains heavily.
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
5. The increase in the already severe congestion on the A3 and M25 particularly around Wisley and Painshill junctions.
6. The lack of suitable public transport.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site.
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels.
- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. My family and I enjoy living in Ockham because of the access to the countryside and clean air and the peace and quiet afforded by wide open spaces. I wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.
- I object to the continued inclusion of the former Wisley Airfield, - now known as Three Farm Meadows because the planning application has already been unanimously rejected by GBC’s Planning Committee.
- I object because there is already a shortage of schools in this and surrounding areas due to lack of planning by the Council and this situation will only worsen as a result of these plans. Our children are the future and we should be doing all we can to ensure they all receive the very best education. The schools planned would not be sufficient.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12383  Respondent: 10950273 / Stuart McDonald  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the draft Local Plan for the following key reasons:

- I object to a plan for the building a disproportionate amount new housing within the Green Belt. Why is Brownfield land not be considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12512  Respondent: 10950273 / Stuart McDonald  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

• I object to a plan for the building a disproportionate amount new housing within the Green Belt. Why is Brownfield land not be considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>pslp172/3475</th>
<th>Respondent: 10950273 / Stuart McDonald</th>
<th>Agent:</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A35</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• The Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys but these areas are small and would not benefit from more housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
As previously set out, I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1. It is the least sustainable strategic site because of the constraints on the site and the physical location.
2. Too far from railway stations.
3. Limited footpaths and safe walking or cycling routes.
4. Located next to and close to very congested motorway M25 and A road A3 which are frequently at grid lock throughout the day.
5. Local roads and back roads are not safe alternatives to blocked motorways and are very busy normally which has lead to consistent accidents due to dangerous black spots (Black Swan junction).
6. Train services already to congested and limited parking.
7. Local roads not safe for bus services, cars, cycles and walking commuters. Unrealistic.
8. RHS Wisley is near to this site and during shows causes increased traffic congestion and incidents.
9. Limited employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
10. I object to the negative impact to heritage sites.
11. I object to the fact that the increased area, will increase the negative impact of the views from the AONB.
12. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
13. I object to the removal of additional 3.1 ha from the green belt without any justification
14. I object to the change in green belt boundary.
15. I object to the fact that the council has failed to remove this site from the local plan.
16. I object to this development because it will not improve the dangerously high pollution levels in this area.
17. I object because the plans includes a new road for the Elm Corner residents which involves having to navigate our way through the new development particularly when there is a better alternative for the residents available to the Council.
18. I object to the proposed Submission Local Plan.
19. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.
20. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.
21. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.
22. I object to the extension of the plan period by 1 year as it has not been identified as a major change
23. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
24. I object to the Council wasting tax payers and residents’ time and money by not following due process and ignoring previous representations.
25. I object to the 10% buffer in the housing number over the plan period.
26. I object to the evidence base which is not transparent and has been challenged.
27. I object to the transport evidence base including the Highways assessment report.
28. I object to the transport assessment which used prescribed vehicle movements from this site with no justification.
29. I object to the housing number, particularly as the Council have not, as required used any constraints such as green belt, infrastructure, air quality. I believe that the housing number is unsound and unnecessary as housing shortage is not in Surrey but in inner London where low paid workers need to live to be near to their work.
30. I object to the apparent disregard the damage caused by nitrogen deposition and high pollution levels.
31. I object to policy S2 because the figures in the AHT table do not add up.
32. I object to the quantity of space allocated for retail in the town centre.
33. I object because the schooling offered is inadequate for this area both pre-school, primary, Junior and High school. Not enough thought has been given to the future need.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to your plans to remove Horsley from the green belt and to build a ridiculous 385 new houses in our small country village. This would be a 35% increase in our current number of homes and as a current resident of West Horsley I know these plans will effect my village in an extremely negative way. We moved into Horsley from London because of its beautiful countryside, greenery and because it is quaint, small and free from excessive noise. For you now to enforce such barbaric plans is offensive and its implications are vast. To say these plans are a disappointment in Guildford council is an understatement and I really feel you are using the power you have to override democracy, as everyone in Horsley I have ever known rejects these plans. This will greatly effect Horsley residents trust and faith in the council.

I urge you to PLEASE reconsider these plans altogether, but if not just to reconsider the amount of houses you are proposing. I do respect the fact you have pressure from central government to build more homes, but please Sir or Madam, look on our small village in favour and do not strip away the beautiful features of Horsley that its residents hold so dear and are the key reasons why we chose to live here in the first place.

I will be praying for your upcoming decisions and these plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/4426  Respondent: 10950529 / Michael Rhiannon  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

To whom in may concern,

This email is to signify that I object to the draft plan for the development of 140 homes and a care home on Site A22. The land is Green Belt and cannot be built on; as a community we must strive to protect the land around us - untouched fields such as these are part of Guildford's beauty. The fields are also a migration route for deer who pass on a daily basis.

In addition to this, the development is extremely close to Whitmoor common - a site of particular scientific Interest.

Furthermore, extra traffic in this area of Guildford would be dangerous - the roads are simply far too narrow to accommodate more cars.

I ask that you please take this into consideration. Should any developments take place it would completely destroy the area in which we live.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5659  Respondent: 10950529 / Michael Rhiannon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A22

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This email is to signify that I object to the draft plan for the development of 140 homes and a care home on Site A22.

The land is Green Belt and cannot be built on; as a community we must strive to protect the land around us - untouched fields such as these are part of Guildford's beauty. The fields are also a migration route for deer who pass on a daily basis.

In addition to this, the development is extremely close to Whitmoor common - a site of particular scientific Interest.

Furthermore, extra traffic in this area of Guildford would be dangerous - the roads are simply far too narrow to accommodate more cars.

I ask that you please take this into consideration. Should any developments take place it would completely destroy the area in which we live.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4428  Respondent: 10950529 / Michael Rhiannon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings
I object to the draft Local Plan for the following key reasons:

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads. The fact that many roads are proposed to be made one directional in terms of traffic flow, provides strong evidence that the infrastructure is inappropriate for the proposed traffic volumes.
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents.
- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.
- I strongly object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farm Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
<table>
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<th>Respondent: 10950561 / Jeanette Pell</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPS16/2531</th>
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I object to new sites (Garlicks Arch) being introduced as an after thought when it was not even considered in the previous plan. A slip road on the A3 at Burnt Common has been added to the Draft Local Plan without Highways England consent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>PSLPP16/5610</th>
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</table>
I object to a totally unrealistic number of houses for the country lanes to absorb

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5612  Respondent: 10950561 / Jeanette Pell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5611  Respondent: 10950561 / Jeanette Pell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.
I object to the 2016 Draft Local Plan as it has had no regard to schools required, add itional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2667  Respondent: 10950689 / Maureen Green  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M2S/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.
- I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.
- Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will mean *either* major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.
- Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** pslp172/2296  **Respondent:** 10950689 / Maureen Green  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
When we moved to Woodfields, School Lane, Ockham, 31 years ago, there was talk about developing the airfield; a neighbour who moved here 40 years ago told me that proposals to develop the site were being discussed even then. At the last Council meeting my husband attended the most recent proposals were rejected by the Councillors **UNANIMOUSLY!**

But were still left in the Local Plan. So what is it that you don't get? For the following reasons that you and we are sick to death of reading and writing about the site is **UNSUITABLE** for development and this has been recognised by the planning authorities for 40 years that I know of!

I require confirmation that all of these comments together with all my previous comments are passed to the Inspector. I reserve my right to appear at the inquiry and present my evidence.

I continue to object to the inclusion of policy A35, Three Farms Meadows, Wisley Airfield, or whatever you like to call it, in the draft Local Plan for many reasons including:

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)
4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   - The associated traffic increase from the RHS has not been taken into account.
   - The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account
8. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station
10. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
11. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”
12. Opportunity (3) should be common to all sites and is not unique to this site
13. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
14. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
15. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
16. I object to the removal of additional 3.1 ha from the green belt without any justification
17. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact
18. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3
19. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
20. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consulters.
21. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
22. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.
23. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.
24. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.
25. I object to the extension of the plan period by 1 year as it has not been identified as a major change
26. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
27. I object to the Council wasting taxpayers’ time and money not following due process and indeed ignoring previous representations.
28. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
29. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
30. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.
31. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.
32. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.
33. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.
34. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.
35. I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development. I particularly object to the reliance on the Carter Jonas study update 2017 which includes “demand” for retail space from companies already in administration.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7014  Respondent: 10950849 / James Barrett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to record my strong disapproval for any development of the former Wisley airfield on the scale proposed.

There are any number of reasons for this I listed three.

The destruction of the green belt and the devastating effect on local flora and fauna

The negative impact on traffic, the local road system could not support a project of the scale proposed both during the construction phase and when the works were complete.

pollution....noise and light pollution.
I object to the draft Submission Local Plan for the following reasons:

1. I object to the removal from the Green Belt of the Former Wisley Airfield (FWA/TFM) and neighbouring properties on its boundary. The site serves an important role in protecting against urban sprawl from London. The planned development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

2. I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five stories high and a population density higher than most London boroughs.

3. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
   2. The increased volume of car traffic. A proposed development such as this could result in around 4,000 additional cars on the roads.
   3. The congestion this traffic will cause on in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and lorry movements.
   4. The danger from this traffic will be to cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with increased visitor traffic) and a proposed 600 pupil secondary school would add further congestion at the M25/A3 junction as well as local roads. No development can proceed without Infrastructure enhancements to the A3 and M25. Highways England has stated that they have no plans to even consider improving the A3 before 2020.
   6. The lack of suitable public transport. The local rail stations of Effingham Junction and Horsley cannot cope with the proposed increase in passenger traffic, and car parking is already at capacity.

I hope that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.
Comment ID: PSLPS16/6214  Respondent: 10951009 / Richard Holley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to the Guildford Borough Council Proposed Submission Local Plan: Strategy and Sites (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadow (TFM) – Allocation A35 for the phased development of a new settlement of 2,068 dwellings

I am not a local resident, but as a frequent visitor to close relatives in the area I would like to object specifically to the following aspects of the proposed development:

1. The encroachment into the Green Belt, and especially the removal of the Former Wisley Airfield/Three Farms Meadow from the Metropolitan Green Belt.

1. The considerable ecological and environmental damage that the development would cause, including an increase in air pollution.

I hope that these concerns will be considered by the Council and that the Former Wisley Airfield (Three Farms Meadow), Allocation A35, will be removed from the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2757  Respondent: 10951105 / Richard Bray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Major doubt concerning housing numbers – The Strategic Housing Market Assessment (not disclosed in Plan or to Council) is drastically wrong and the numbers in it have wrongly been inflated by Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5732  Respondent: 10951105 / Richard Bray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (

The plan also includes extensive developments at Burnt Common (400 houses & commercial developments) and Gosden Hill Farm, Burpham (2,000 houses & mixed use developments)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5731  Respondent: 10951105 / Richard Bray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (

Development of over 2,000 house village at Ockham (former Wisley Airfield) – The impact on the Horsley villages of such a huge mixed housing, retail, commercial, traveller and schools development, under 2 miles away, would be enormous

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11603  Respondent: 10951105 / Richard Bray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (

Station Parade designated a District Centre – This classification results from a complete misreading of the nature of the facilities in the village centre and would inappropriately target the area for future urban developments. The few shops are already surrounded by residential homes

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<tr>
<th>Comment ID: PSLPP16/11600</th>
<th>Respondent: 10951105 / Richard Bray</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Schools are totally full – heavy reliance on private schools.i1

(2) One Medical Centre in Kingston Avenue serving circa 12,000 people (bursting). I1

(3) Drainage overloaded and not maintained. I1

(4) Roads overused and constantly requiring maintenance. Public car parks constantly in use. I1

(5) Railway Station – Horsley – extremely busy and car park full on weekdays.i1

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<thead>
<tr>
<th>Comment ID: PSLPP16/11594</th>
<th>Respondent: 10951105 / Richard Bray</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Proposal to remove the Horsleys from the Green Belt – the exceptional circumstances required before taking this action have not been demonstrated

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/11597</th>
<th>Respondent: 10951105 / Richard Bray</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Extension of the boundaries of the Settlement areas of the Horsleys – No sound reasons have been given for the proposed changes, which seem to be aimed solely at increasing the land available within the settlements for future additional development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5137  Respondent: 10951489 / Lorna M Cave  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the suggestion that 45 houses could be built at Clockbarn Nursery. The junction of Tannery Lane and Send Road is already hazardous and Tannery Lane far too narrow to cope with even more traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5138  Respondent: 10951489 / Lorna M Cave  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed development at Garlick’s Arch. This is ancient woodland plus there is absolutely no justification in that number of houses or the industrial space.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5139  Respondent: 10951489 / Lorna M Cave  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object, again most strongly, to the four way access to the A3 at Burnt Common. Nobody considering this can possibly have been on Send Road/Send Barns Lane during rush hour or they would know that at these times the roads are gridlocked. Send, Ripley and Clandon would come to a complete standstill.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10368  Respondent: 10951489 / Lorna M Cave  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that you can’t possibly have thought of the impact on the infrastructure in Send – the surgery, the school and most of all, the roads won’t be able to cope.

All of the above I beg you to consider very carefully, but the over-riding impact of these objections has to be the traffic through Send. Believe me, Send cannot take anymore.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10367  Respondent: 10951489 / Lorna M Cave  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I write to object to the sudden change of the local plan allowing no time for Send to be consulted. It is very different to the previous consultation in 2014.

I object, most strongly, to Send being taken out of the Green Belt. There is no justification for this and it will result in Woking and Guildford becoming one huge conurbation. There are plenty of brownfield sites that should be used first and NOT the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/376  Respondent: 10951489 / Lorna M Cave  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy 2 at para. 4.3.15 to inset Send Business Park from the Green Belt. Once again, Tannery Lane cannot cope with more traffic and the junction with the A247 is so dangerous. It is in an area of beautiful countryside and close to the Wey Navigation which is used by young and old to enjoy family walks etc..

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2820  Respondent: 10951489 / Lorna M Cave  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A 42 where you have increased the homes to be built there from 45 to 60. As I said previously Tannery Lane and the junction with Send Road is too narrow and very dangerous to have anymore traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2821  Respondent: 10951489 / Lorna M Cave  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A 43 being changed to 400 homes and 6 traveller sites. You have completely ignored all the objections and the number of homes is totally unjustified. It is ancient woodland of which there is precious little left and will virtually join up Send and Ripley ignoring the reason for Green Belt. Again the traffic will be a nightmare as the roads around are gridlocked during the rush-hour every day.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2822  Respondent: 10951489 / Lorna M Cave  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A 58 for a new allocation of 7,000 sq. metres of industrial or warehousing – the 2017 Employment Land Need Assessment shows a reduction in demand not an increase! At Slyfield there are empty spaces and industrial sites which lends itself much more to this sort of development than in Send in the middle of Green Belt – it is totally unsuitable. WHY in a village like Send?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4134  Respondent: 10951777 / Jackie Turner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to the proposal to build 1,800 houses, and industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm. This will:

- Destroy views from the Hog’s Back ridge, a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of farmland and ancient woodland from the greenbelt
- Threaten protected wildlife such as skylarks, orchids and deer.
- Increase tailback on the A31 which are already a problem
- Further increase traffic in Guildford, which is already in gridlock almost every day of the week, which in turn will cause further problems for emergency vehicles especially in the area around the RSCH.
- Add to Guildford’s air pollution
- Result in rat-running through residential streets, and additional parking in these same streets
- Result in flooding of homes at the bottom of the slopes due to reduced absorption of the land

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4258  Respondent: 10951777 / Jackie Turner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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- Increase tailback on the A31 which are already a problem
- Further increase traffic in Guildford, which is already in gridlock almost every day of the week, which in turn will cause further problems for emergency vehicles especially in the area around the RSCH.
- Add to Guildford’s air pollution
- Result in rat-running through residential streets, and additional parking in these same streets
- Result in flooding of homes at the bottom of the slopes due to reduced absorption of the land

In addition, the new land evaluation study, carried out by Land Management Services, an established firm of landscape architects, assessed the area using Natural England’s latest AONB criteria and found that nearly the whole of the 265 hectare farm was of a landscape and scenic quality that merited inclusion within Natural England’s revised Surrey Hills AONB boundary.

The study also recommended that adjoining “semi rural” areas on the western edge of Guildford, which did not meet AONB criteria, should remain undeveloped as they provided an important setting to the AONB.

Why are the results of this study being blatantly ignored?

Please listen to those of us who have lived in Guildford for many years and who love our area; stop the urban sprawl and keep our naturally beautiful countryside.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8656  Respondent: 10951777 / Jackie Turner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In addition, the new land evaluation study, carried out by Land Management Services, an established firm of landscape architects, assessed the area using Natural England’s latest AONB criteria and found that nearly the whole of the 265 hectare farm was of a landscape and scenic quality that merited inclusion within Natural England’s revised Surrey Hills AONB boundary.

The study also recommended that adjoining “semi rural” areas on the western edge of Guildford, which did not meet AONB criteria, should remain undeveloped as they provided an important setting to the AONB.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5941  Respondent: 10952097 / Peder Banér  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We are writing in response to the publication of the new local plan and have the following objections and comments:

1. Policy A35, (Former wisely Airfield),

We object to the overriding of the Green Belt designation of this area. There are no valid reasons to permit a new development of this scale in the middle of the Green Belt with a character totally out of keeping with the existing environment in the long established villages in the surrounding area.

The resulting congestion on existing roads has not been satisfactorily considered and if such a scheme was to be permitted a much more extensive road upgrading program must be implemented. For example, the proposed access to the A3 at the Ockham roundabout only permits access to and return from the North; i.e. London bound. The only access and return from
Guildford to the South is through the village of Ripley, which suffers serious congestion at times already. The only way to overcome this problem is to create south going slip roads from the roundabout to the A3 at the expense of the developer. The proposal will otherwise destroy the village character of Ripley.

The proposals seem to be entirely aimed at creating transportation facilities for London commuters. Guildford Borough Council should be concentrating on ensuring that the communications with Guildford are considered as a priority for any inhabitants of the Borough. For example, the transportation with buses assumes that commuters will travel to Effingham, Horsley and Woking railway stations. Why would anyone other than a London commuter want to take the train from Woking? There is mentioned an improvement in the set down arrangements for buses at Effingham station. The station car park is already fully utilised and there are no set down or pick-up facilities for cars there. The road leading there (Old Lane) has a number of dangerous blind corners and trees alongside the carriage way and is much too narrow for the amount of traffic that will be generated. If this scheme is to be allowed, the developer must be obligated to provide a road upgrade to an adequate standard for the frequency of traffic to be expected and provide for bicycles and pedestrians too! It is suggested in the policy that a bus service to Horsley station will be provided. This ignores that the B2039 through Horsley in parts is too narrow to permit a bus to meet a truck, unless one of them drives up onto the pedestrian pavement. It also ignores that during school term the B2039 gets temporarily blocked by mothers delivering their children to the Glenesk School in the morning. Horsley station car park is already fully utilised and the set-down and pick-up area is already fully utilised by the existing station users, not to mention those that would be added if the 533 proposed new houses in the Horsleys get built.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/5943  **Respondent:** 10952097 / Peder Banér  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A41

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer:** (if comment is on questions 1-7 of the questionnaire): ()

Policy A41. By permitting a development of this area a larger green area inside gets locked in by the development. There is no good reason given for this change of the settlement boundary. The existing adjacent houses have a rural character, which would be destroyed by a new development in this location.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/12031  **Respondent:** 10952097 / Peder Banér  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer:** (if comment is on questions 1-7 of the questionnaire): ()
It is not explained why the “Station Parade” in East Horsley has been designated a “District Centre”. The facilities there are only limited and serve mainly the local needs. The parking facilities there are already stretched to the limit for much of the time. A “Local Centre” would be a much more relevant description.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12029  Respondent: 10952097 / Peder Banér  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

No good valid reasons have been given for removing the Horsley’s from the Green Belt designation, and we object to that.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12039  Respondent: 10952097 / Peder Banér  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a general comment the extent of the proposed sites and settlement boundaries have been too much influenced by existing land ownerships. As a consequence, in too many cases parts of the proposed developments stick out into the Green Belt beyond the existing or natural settlement boundaries

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8187  Respondent: 10952129 / Nick Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am strongly opposed to the removal of West Horsley from the Green Belt. It is this protected open space which gives West Horsley much of its character. The removal of this protection will have a significant adverse effect on the nature of the village and ultimately lead to a conurbation stretching all the way from Leatherhead to Guildford. I do not believe that the current circumstances warrant any change in the Green Belt status here in West Horsley.

The urbanisation that would follow removal of Green Belt status would be completely at odds with the village as it is now. The potential development of around 500 homes on Green Belt land in this parish would be out of all proportion to the existing community and its infrastructure. The nature of such housing developments, by virtue of their type and density, would markedly change the character of West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8188  Respondent: 10952129 / Nick Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I recognise that there will be some need for further housing but believe that there are still sufficient opportunities for this to take place on a manageable scale in West Horsley within the confines of the existing Green Belt. Land is such a limited resource in this country that we need to make more efficient use of already-developed areas before resorting to building over the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3607  Respondent: 10952161 / Alison Humberstone  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 1354 of 2167
I write with regards the impact the local plan will have on Send.

Please share with the planning inspector.

I live in Send and my family have been here since the early 1900s.

The traffic in the village is now at an unacceptable level. It can take 10 minutes to get off my drive in the morning due to the traffic, often at standstill back from the traffic lights. We have also seen a number of accidents.

To proceed with or even suggest these developments in Send are crazy as the village cannot cope with the traffic levels today. It is basically a one Road in and out village and Send Road is over capacity.

I am furious I have to even write to you to ask you to stop this suggestion of removing the village from the Greenbelt. It is in the greenbelt to project the green areas from development and retain them for future generations to enjoy. Now you want to remove this protection because it's inconvenient to you making your quotas for new development? I am so upset by this as the council should be supporting the protection not seeking to remove it. There is no good reason for this and if the Greenbelt protection were to be removed this would simply benefit the developers. Why ever would such a crucial protection to our green areas be removed?

My suggestion would be that with some reduction in scale from the current proposals for Wisley Airfield, a sympathetic development with a smaller number of houses at one end you could achieve additional housing without unnecessary impact to walkers and horse riders and removing a great amenity for local residents.

I object to the proposed houses at Clock barn nurseries site. Tannery lane is tiny and cannot cope with the traffic today and to add more houses and therefore more cars to Send is ridiculous. This makes no sense and needs to be stopped.

I object to the proposed development at Garlicks Arch. An area which floods, is covered in lovely old woodland should not be removed as it's in the way. Keep Send in the Greenbelt and protect these lovely places.

I object to the proposed development in Send Hill. If such pitches are needed utilise brownfield sites and don't ruin the Greenbelt. I would not propose to build a home on the Greenbelt as I would expect to be turned down flat. That should be the expectation and the reality. Travellers sites should not be provided in the Greenbelt.

I object to a new interchange at Burnt Common. Send has too much traffic heading to Woking already and this would just cause more traffic through the village. Simply don't build all these new houses proposed and its just will not be needed. The council members will no doubt know the area and the traffic in the morning heading to Burnt Common. It can take half an hour some mornings from Send Road. This would make an already bad situation into traffic hell.

I feel utterly let down by the council. Send is a lovely village which is why I chose to love here and I don't have the money to just move because the council have decided to ruin it to meet some numbers from central government, sacrificing the village to build a certain number of houses some faceless bureaucrat says we need. Please help stop this, don't encourage this. You need to fight for the Greenbelt and the local villages and find a better way without ruining or making miserable the lives of local residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to this proposal as anyone who lives in Send who uses Tannery Lane knows the small rural lane is utterly unsuitable for further developments to take place, turning into Send Road from Tannery takes an age and is difficult to exit to Send Road. You have already allowed, despite objections which I assume were again just ignored, a Marina no one wanted and which we all knew was a precursor to further development requests. Not only have we been ignored, but you have this time decided to INCREASE the number of houses for the site by 30 odd%. The impact on traffic, the green belt, amenities and the area itself makes this a completely unacceptable development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attacked documents:

I object to this and simply don't understand how development of an area under the protection of green belt can be considered or allowed. What possible "exceptional circumstances" can be shown to make this acceptable? None.

It seems clear to me that the inclusion now of pitches for "travelling show people" is simply a blatant attempt to drive this through despite the thousands of objections you have received! Suggesting there is a need for travelling show people pitches is blatant use of a minority to get your way, even suggesting such a need even exists is ridiculous and I am sure meets some planning exception to allow you to bypass the green belt protection. You should be ashamed. Why would you use some an approach to destroy a lovely and ancient wooded area? Just to build some 400 homes to meet some central government quota which takes NO consideration of impact, you would destroy this land? appalling. This is unacceptable and should not proceed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attatched documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this (previously removed) item being brought back. You have now even made it bigger and more impacting than even before, despite the huge volume of objections which led it to be removed previously. It was "maximum of" when you had so many objections it was removed, now its been brought back as a minimum of 7000 sq m of warehousing! This shows utter disregard for the unnecessary damage to the green belt (which I believed was protected but which the GBC seem to feel is just protected in the past to make it available for them to squander now and future generations will simply be deprived of if GBC don't step up and take a better/correct stance and protect it). Why is this even on here? This smack of adding in something to concede in negotiations. This is not needed, was removed before, no new need has occurred yet you bring it back even worse than before so you can drop it but push on with the other items. This is not a game! The 2017 Employment Land Need Assessment shows less of this type of property is needed, Slyfield has land and vacant buildings and yet you bring this back? Stop causing upset and concern for Send and surrounding villages and accept that this is not needed, impacts the locals and the environment/green belt. Drop it now.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1730  Respondent: 10952161 / Alison Humberstone  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to inset Send Business Park from the Green Belt. Its in the greenbelt, clear and simple. Further, Tannery Lane is a small rural lane with poor access and it simply cannot accommodate more traffic. Traffic is already a nightmare and anyone who uses the lane knows that. Its cannot take more and the village cant take more. Once again, you just seem determined to find ways to bypass Green belt protection (despite the fact its clearly within and surrounded by greenbelt) and it is unacceptable. If you are able to get this through it simply opens up the option for further development. and further (irrevocable) destruction of the greenbelt you should be protecting. GBC needs to step up and stop ANY intrusion or impact to the greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4396  Respondent: 10952193 / Chrissie Beard  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the removal of the Horsleys from the Greenbelt and I do not believe that there are any genuine 'exceptional circumstance' for doing so.

I further object to the proposed density of house building. The proposed building is far beyond what is required to meet the needs of local people.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17901</th>
<th>Respondent: 10952193 / Chrissie Beard</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Large scale development would destroy the character of the villages of East and West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17895</th>
<th>Respondent: 10952193 / Chrissie Beard</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

No genuine consideration has been given to the local infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Local schools are under serious pressure and are unable to meet the needs of local students
We have insufficient local health provision from GP practices
Our local hospital is already overstretched and could not meet the needs of an increased population
Despite repeated planning application our local hospital is constantly refused planning permission to extend its parking facilities for local people on the grounds of its proximity to the A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Local roads are already in appalling condition and a dangerous state of disrepair

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Local roads are already in appalling condition and a dangerous state of disrepair

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
All minor and major roads in the area are seriously congested.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17900  
Respondent: 10952193 / Chrissie Beard  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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During morning and evening commuter times the A3 resembles a car park and the road could not cope with extra traffic.

Commuter train services to and from London and Guildford, cannot cope with the current numbers of commuters, despite the platform having been extended.

Local bus services are almost non existent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17897  
Respondent: 10952193 / Chrissie Beard  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Flooding to the local area has not been addressed and would get progressively worse with further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/2053  
Respondent: 10952193 / Chrissie Beard  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The amount of housing is estimated to give a population increase which is almost 70% higher than the official national estimates for population growth in the borough

The inflated number of proposed houses is based upon a consultants mathematical model which is not revealed in the plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8081  Respondent: 10952257 / Darrel Wilkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Additionally, I object to the plan for a new interchange with the A3 at Burnt Common as Send would have to take traffic from the proposed 2,000 new houses at the Wisely Airfield, 2,000 houses at Gosden Hill, Burpham and 1,850 at Blackwell Farm. Much of this traffic to and from the A3, M25, Woking and Guildford would go through Send. Send Road is already very congested, would become gridlocked (as it does sometimes now with any road-works). Noise and pollution levels, already at excess levels would worsen. The impact would continue through to Old Woking, which also suffers from major congestion.

I request that my comments are shown to the Planning Inspector who will make the decision on the Guildford Local Plan. Please confirm receipt of this email.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8080  Respondent: 10952257 / Darrel Wilkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I write this email to register my objection to the draft Guildford Development Plan. Overall I feel the scale of this development is too much for the small village of Send.

I object to the development in Policy A44. 1.9a Land West of Winds Ridge and Send Hill site on the following grounds:

- I object on the grounds neither the Council nor Chris Brown own all of the right-of-way into the land in question. My wife (Martha Wilkinson) and I own a lot of this right-of-way and have chartered land surveyor drawings as well as the deeds to our property documenting this. We will not sell or release this land for development or access.
- I object on the grounds that it would have a detrimental impact on the wildlife, some of which is endangered; there are little owls, bats, slow worms and crested nutes on the ground in question among many other species.
- I object on the grounds that Send is in the green belt. The proposed inset is inappropriate due to its permanent green belt status.
- I object on the grounds that Send Hill is a narrow road and goes down to a single lane on one end and cannot support this extra traffic. It already suffers from bad congestion, especially during school times.
- I object on the grounds the site is not large enough for the proposed use.
- I object on the grounds the proposed site is not fit for development as more than half of it is landfill and contains harmful multiple different types of asbestos waste which will be dangerous to disturb and remove. What assurances can Guildford Borough Council and, the developer in question, give that there would be zero health risk to existing residents as a result of this proposed new development?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I wish to register my strong objection to the developments in Normandy and Flexford proposed by the Draft Local Development Plan.

I have read the evidence offered both by the Parish Council (13 July 16) and the Normandy Action Group (July 16) in their objections, both submitted for your consideration. I agree with the content of these submissions.

In addition I would like to amplify my own personal reasons for objecting to the plan:

Overall

I wish to be clear that I am not opposed to all development; the numerous small developments that have been, and are currently being, implemented around Normandy are sympathetic to the character of the village and will create much needed new, and, sometimes, affordable housing. The use of brown-field sites such as the re-development of the former heavy recovery garage on Flexford Road, is particularly impressive.
I do object, however, to the planned ‘safeguarding’ proposal for large areas of land currently in use as farmland. The building of large numbers of homes on this land will significantly alter the area and change its character beyond recognition.

I would wish the planning committee to note my following specific concerns. I am aware this is not an exhaustive list and others have commented and included professional advice as to the lack of legitimacy of the plan (as mentioned above the NPC and NAG submissions are of particular note). I wish to add to these by highlighting those about which I have some personal knowledge:

**Amenity Value**

1. The area to the north of the Hog’s Back and its villages is currently semi-rural in character. This creates a very attractive environment that is enjoyed not only by the local residents but by many walkers, cyclists, riders and runners who pass through the area along its many footpaths including the very well trodden Christmas Pie Trail. I am a keen walker and runner and routinely encounter fellow enthusiasts for the open countryside. The feel of a footpath that runs though farmland or a wood is utterly different to one that skirts a large area of housing.

2. The original purpose of the Green Belt was to preserve this kind of amenity value and prevent the extension of development that diminishes or removes the separate character of small communities. Guildford is a large and successful city; its popularity is enhanced by the proximity of significant areas of rural and semi-rural land that have hitherto successfully been protected by Green Belt status.

3. The view from the footpaths at top of the Hog’s Back (and indeed from drivers on the A31) looking north towards Wanborough, Normandy, Flexford and Wyke is one of unbroken semi-rural land that culminates in Ash Ranges. Ash Ranges will not be developed so a significant development in the Normandy area interrupting this vista would greatly diminish this otherwise exceptional impression of the Guildford area and risk damage to the area’s overall appeal (ie undermine the Guildford area’s attractiveness for business and living). It is this ‘openness’ that Green Belt protection is intended to protect; additionally the majority of this view is part of the Surrey Hills’ Area of Outstanding Natural Beauty (AONB). To place a large urban development on its edge will dramatically undermine its sense of ‘completeness’ as an all-too-rare a view of semi-rural England.

**Wildlife**

4. The proximity of Ash Ranges adds to the importance of the adjacent agricultural land covered by the proposed changes to the Green Belt bounders. The Ash Range area is a SSSI made up of a mixture of lowland heath land, conifer and broad-leaved woodland, mire, scrub and acid grassland supporting a wide range of fauna and flora. The majority of the area is designated a Site of Special Scientific Interest and forms part of the European designated Thames Basin Heaths Special Protection Area (TBHSPA). While these fauna are home on the heath land they also exploit the surrounding areas of countryside so any development nearby could affect them (see para 64 of PPS9 circular 06/05 link).

1. In formal terms, the designation of Ash Ranges as part of the Thames Basin Heaths Special Protection Area and an SSSI places a special duty on the authorities to protect this land. I run on this land and see a reasonable number of other users, especially dog walkers. The proposed housing development would dramatically increase this use (being only a few hundred metres from its northern edge) without an alternative green space provision. The proposed SANG is utterly inappropriate to address this pressure, being further away and smaller.

**Agricultural Use**

6. It is quite some time since I have worked in agriculture but even to my untrained eye the agricultural use of the area in question is of both high quality and productive. The fields are well kept and used for both arable and livestock. As well as being productive farmland (including ancient woodland) they contribute to the greenness and openness of this part of the green belt and the rural feel and atmosphere; it is this kind of agriculture that characterises this part of England and draws so many people to the area, both for recreation and for living. ie the whole purpose of the Green Belt protection. Its destruction leaving other brown-filed sites untouched does is not
sensible or supportable.

**Local Infrastructure**

7. I have used both public and private transport during the twenty-seven years I have lived in Normandy. It is my direct experience that both of these are under some considerable stain, especially at rush hour times. Adding significant numbers of houses to the area cannot but make this worse. I understand the County Council has modelled this and found the roads to be unsuitable for the increases in traffic that would result from 1000+ new houses, a school, retail and a care home.

8. I am not a hydrologist but as I ran across many miles of the countryside over the last couple of winters the large areas of standing water that persisted, for weeks in some cases, lead me to think that the area also has a significant part to play in holding water and thereby preventing even worse flooding elsewhere.

**Basis for Development**

1. The Planning Practice Guidance chapter on Protecting Green Belt Land, paragraph 80 states:

   Green Belt serves five purposes:

   - to check the unrestricted sprawl of large built-up areas;
   - to prevent neighbouring towns merging into one another;
   - to assist in safeguarding the countryside from encroachment;
   - to preserve the setting and special character of historic towns; and
   - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

   Four out of these five purposes are met by the Normandy Green Belt under threat (ie not historic – but even this is debatable with a number of building of historic significance, not to mention the ‘feel’ of an ancient small Surrey village that has grown quietly over centuries)

   1. There has been no proper explanation of the rationale behind Guildford Borough Council's housing quota, and the basis of the Local Plan indicating that Normandy needs many hundreds of new homes. The council itself admits it does have access to the underpinning methodology. This, I understand, is because the work was contracted to a company independent of the council, which in turn sub-contracted it to another. This company will not reveal the process it used to come to its conclusions. This lack of visibility of the criteria being used to make a significant and disruptive (and highly contested) local decision does not accord with open government and accountability. The evidence base and algorithms must be made available for scrutiny or the process might risk later challenge by judicial review.

   1. The Council for the Protection of Rural England states that building on brown field can mean regeneration, while building on open fields is destructive and environmentally damaging in any circumstance, exacerbated in this instance by the proximity of the THBSPA, SSSI and Area of Outstanding Natural Beauty. For the developers leading this proposal large scale green field exploitation is more cost efficient that utilising brown field. It is for the planning process to test the significant non-financial disadvantages of green-belt destruction.

   1. Normandy's Site 368 is listed in the Local Plan as 'safeguarded' for this development of 1100 houses; it is not. 'Safeguarded land' is land that is not Green Belt; the land covered by the plan is, however, Green Belt and it has not been removed from the green belt. For removal to be approved it has to be proven that there are exceptional circumstances for the removal. These have not been demonstrated and no inspectorate has therefore approved this change from Green Belt.
1. The case for a 'much needed secondary school' is not proven as sufficient reason (ie 'very special circumstances') for removing Normandy's Green Belt land. The Planning Practice Guidance chapter on Protecting Green Belt Land, paragraph 88 is clear:

When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

Paragraph 89 is equally clear on the permitted exceptions:

A local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are:

- buildings for agriculture and forestry;
- provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it;
- the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan; or
- limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.

Were there a need for a school, that need is not deemed 'a very special circumstance' as required by planning law.

1. There also appears to be little evidence that Normandy needs such a school - certainly not at present. Ash Manor and Kings College are both undersubscribed. If other villages need school capacity then building separate from their homes and encouraging children to travel along roads with limited or no footpaths and lighting does not seem appropriate.

1. The plan also uses the school as part of remarkably circular argument: the only possible justifiable reason (disputed as above) to build on the Green Belt is the new school, which in turn leads permission for new houses, the only reason to build the school is for children from the new houses.

Sustainability versus Sensitivity

1. Finally, two key concepts that underpin the local plan are an area's 'sustainability' and its 'sensitivity'. For the former assessment, Normandy and Flexford have been ranked as one settlement, while for the latter they have been ranked as two. This inconsistency serves those intent upon using this land; it means that all the sustainable assets have been aggregated to maximise their score, while the Green Belt 'sensitivity' of the open land between the two settlements is ignored when assessing them separately for their 'sensitivity'.

2. In summary, please strongly consider revising the Local Plan to fully exploit all possible Brownfield sites before any inroads are made into the irreplaceable Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
A46 and A47 support of removal from plan. Following my earlier response to sites A46 and A47, the proposed building on Green Belt in Normandy, I strongly support the removal of Sites A46 and A47 from the Local Plan owing to the inability of the infrastructure, particularly transport, health and environmental, to cope with these scales of development. The sites' proximity to the Thames Basin Heaths Special Protection Area Â protected area also makes the removal particularly welcome in order to protect this key habitat.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

The proposed change to 'inset' of the Normandy and Flexford settlements should be removed and a clear statement that the Green Belt land and surroundings in Normandy and Flexford retains its 'washed over' status as a contributor to the openness of the Green Belt. This 'openness' has already been accepted by planning inspectors in past appeals so rejecting 'inset' status would follow this precedent.

Attached documents:

Comment ID: pslp172/2673  Respondent: 10952449 / Hugh Robertson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A46 and A47 support of removal from plan. Following my earlier response to sites A46 and A47, the proposed building on Green Belt in Normandy, I strongly support the removal of Sites A46 and A47 from the Local Plan owing to the inability of the infrastructure, particularly transport, health and environmental, to cope with these scales of development. The sites' proximity to the Thames Basin Heaths Special Protection Area Â protected area also makes the removal particularly welcome in order to protect this key habitat.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Attached documents:

Comment ID: pslp172/2674  Respondent: 10952449 / Hugh Robertson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A47

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A47 support of removal from plan. Following my earlier response to site A47, the proposed building on Green Belt in Normandy, I strongly support the removal of Sites A47 from the Local Plan owing to the inability of the infrastructure, particularly transport, health and environmental, to cope with these scales of development. The sites proximity to the Thames Basin Heaths Special Protection Area Â protected area also makes the removal particularly welcome in order to protect this key habitat.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I strongly object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Site

Although the Garlick’s Arch land, from a plan view on a map, looks to be a perfect housing development site, let’s look at it closer.

- Firstly, there is a watercourse that weaves across the centre of the land – this stream crosses under the Old Portsmouth Road and then along the backs of the houses opposite our home on Maple Road. This stream has flooded on a number of occasions before affecting a number of the homes in Maple Road and Send Marsh Road. I feel sure that the new development would not allow surface water drainage to be fed into our already overloaded local drainage system so the water will be discharged into the stream presenting an increased risk of flooding to our existing homes.

- The land is bordered by two main roads – the A3 to the south east, and the Old Portsmouth Road to the northwest. We can hear the A3, quite loud at times, even though Maple Road is at least 500 metres distant at the closest point – Homes on the Garlick’s Arch land could be within metres of this major artery to London and the M25, placing them in Noise Exposure Category Zones C and D (Planning Policy Guidance No. 24).

1. Noise Exposure Category Zone C is classified as land that “Planning permission should not normally be granted. Where it is considered that permission should be given, for example because there are no alternative quieter sites available, conditions should be imposed to ensure a commensurate level of protection against noise.” Please note the underlined phrase – there are other local sites much more distant from the motorway network such as the Wisley Airfield site which would be much more suited to residential development.

2. Noise Exposure Category Zone D is classified as land where “Planning Permission should normally be refused.”

- A proportion of the land is wooded – it would be unacceptable to lose this habitat and tree screen between the A3 and our estate.

- This land is Green Belt ... other than a few houses and a small business unit, the proposed site is undeveloped fields and woodland. Wouldn’t it be better to build on brownfield sites, such as Wisley Airfield which, despite claims to the contrary, is brownfield as it has a 70m x 2.0km strip of concrete runway (14 hectares) down the middle of the site along with 1.2 hectares of other hard surface for hangers, taxiways and maintenance areas.

The Surrounding Area

The Garlick’s Arch land acts as part of a ‘separator’ between Send and West Clandon, helping to maintain the individuality of the villages rather than allowing them to melt together into one large mass of housing.

Local Roads, Infrastructure and Services

- The increased traffic flows onto the Old Portsmouth Road from an additional 400 homes on the Garlick’s Arch land would only make the already appalling traffic conditions here worse. In the morning it often takes 5-10 minutes to turn out of Send Marsh Road onto the Old Portsmouth Road, there are traffic queues into Ripley Village, there are traffic queues and the Burnt Common Roundabout, there are queues trying to get into Send Village, and accessing the A3 southbound can be a challenge (and you have to go through Ripley if you want to go north on the A3).

- The few local schools – Send Primary and Ripley Primary – are already full to bursting point. Between them, they have only 90 places to offer every year and their buildings would not take further expansion without massive investment, the overloaded surrounding roads inadequate already to deal with the daily school-runs.

- It is already difficult to get to see a Doctor on the first day of an illness – an additional 1800 people (400 homes with two adults and 2.7 children) would make it impossible to get medical advice when you need it at the local surgery.

- Local services and organisations – such as Send Help, Little Owls Nursery, Send and Ripley Scouts and Guides are all current stretched to the limit ... the area just cannot take any more people.
I realise that my one voice doesn't count for much, but mine is one voice in a crowd of other voices all quoting the same thing, "Please, not Garlick's Arch!".

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPA16/921</th>
<th>Respondent: 10952705 / Moira Maidment</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick's Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

0 The "objectively assessed need" figure of 693 homes a year is too high.

0 A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

0 The current SHMA inflates the proposed housing figure due to failure to correct for errors in the historical data for international migration flows,
It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is, I believe, inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
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I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data: 2010-2014 from Crashmap data
Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham's sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost. There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.
Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England's requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an "aspiration" in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West dandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1424  Respondent: 10952705 / Moira Maidment  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.
It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justificat ion for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick's Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current "soft" edge approach to Guildford.

Garlick's Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (Blc), general industrial (B2) and storage and distribution (B8).

There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2). The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick's Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council's own Green Belt & Countryside Report does not address Garlick's Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy 13).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy 14)
It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy 11)

Furthermore, several electricity pylons run through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of 'through' traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3049  Respondent: 10952705 / Moira Maidment  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy 03)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough. The proposed development at Garlick's Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3062  Respondent: 10952705 / Moira Maidment  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy 03 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will "enhance" heritage assets which I fear is a developer's charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3063  Respondent: 10952705 / Moira Maidment  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy 04 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3040  Respondent: 10952705 / Moira Maidment  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick's Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick's Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (Blc), general industrial (B2) and storage and distribution (B8) at Garlick's Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick's Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3042  Respondent: 10952705 / Moira Maidment  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class Blc, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick's Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3046  Respondent: 10952705 / Moira Maidment  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy ES)

Policy ES supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick's Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3065  Respondent: 10952705 / Moira Maidment  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor "attractions" and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk
of becoming an excuse for overdevelopment/"Disneyfication". Heritage sites and the Green Belt are particularly vulnerable to hrm.

Guildford has many "leisure and visitor attractions" already. The case for creating more is not made and no examples are given. Instead, the plan's explicit priorities should be:

1. To protect the borough's prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

   1. To help make Guildford's river landscape less off-putting and support town-break packages for high-value To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
   2. To help private providers market local touri This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An "English town break" (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

1. To rule out the redevelopment of scarce rural hotel sites (e.g., Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/3060  **Respondent:** 10952705 / Moira Maidment  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy "vision" describes protecting the Guildford's unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.
The policy does not address any of the major issues raised by the Council's own Town Centre Master Plan, the Guildford Vision Group's proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford's character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3058  Respondent: 10952705 / Moira Maidment  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1- Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/3059  Respondent: 10952705 / Moira Maidment  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an 'affordable home'is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will 'affordable homes' be able to go onto the market at full market price? As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3064  Respondent: 10952705 / Moira Maidment  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy H3 - Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the "mix" this can include "market" housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances." The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be "closely related". Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances."

The size and location of sites should be better defined and it should be clear market housing cannot be included.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy 11).

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration of road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends when hundreds of cyclists pass through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming even more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough's infrastructure is already heavily strained. However the plan's determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council's methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy 11. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough's infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council's control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable. Policy
I require the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick's Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents' in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick's Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3055  Respondent: 10952705 / Moira Maidment  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy 12) I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situation worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to poor air quality concerns (Policy 13)

Paragraph 4.6.27 of the Plan states that "Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health." The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council's to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of "only" 1.6% of the borough's Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an "acceptable" percentage. The
fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council's growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers' hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the "insetting" of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to include them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the "openness" of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF's other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To "inset" two-thirds of the borough's rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough's location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed "insetting" and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17's aim of "empowering local people to shape their surroundings" and other NPPF provisions.

Paragraph 4.3.17 states that "the general extent of the Green Belt has been retained." I believe this should be deleted as an untruth.

In addition I object to the proposals to remove from the Green Belt the so called 'strategic sites' of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick's Arch (A43) and all other strategic sites.

National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a 'special circumstance') to be taken from the Green Belt. Once taken from the green belt they will be lost forever.
There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/3066  **Respondent:** 10952705 / Moira Maidment  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate?**  
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that "allocating these sites does not grant planning permission for development." However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether "exceptional circumstances" existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

1. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as its infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.
1. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless "exceptional circumstances" for development are proven in relation to that specific site, as stipulated repeatedly in the N

The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are

argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3039  Respondent: 10952705 / Moira Maidment  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding.

Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3033  Respondent: 10952705 / Moira Maidment  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY S1

I object to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan,

Policy S1 ought to set a clear framework. Instead, no definition of "sustainable development" is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims, “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as "sustainable", in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications "wherever possible" and "without delay" reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across...
rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also
unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for

Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be
given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport
options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further
vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will
suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does
not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach
differs from all the other Borough Councils in

Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need
to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri borough area of
Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study.
On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and
half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the
North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey".
Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justificati
on to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say)
Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex
housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public
consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however,
does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For
instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open
countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford's OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is "deliverable" and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council's cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered "deliverable". In addition, the number of homes proposed, plus existing planning permissions, plus expected "windfall" sites exceeds the total of 13,860. So how many homes do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a "plan" that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB, and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably increasing the housing stock in a mainly rural or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly.

The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London's commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brownfield sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and
surrounding area in particular. The developments at Garlick's Arch and Gosden Hill Farm do not meet the needs of the local communities. The road in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** SQLP16/664  **Respondent:** 10952705 / Moira Maidment  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire):** (No)

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up to date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest 'value creation' areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures Independent assessments of the SHMA (eg from Guildford Residents' Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.
In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/661  Respondent: 10952705 / Moira Maidment  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/662  Respondent: 10952705 / Moira Maidment  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. "Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt." Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

1. The housing OAN figure has been calculated by a process which is not It has not been properly examined by Councillors before being adopted.
   1. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

1. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

1. The draft Plan does not accord with the NPPF policies on protecting the Green Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be just ified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites which amount to 65% of the proposed housing number.

2. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the

3. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and s
   1. Much of the infrastructure required to support the level of development proposed is outside the Council's control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer's business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

1. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.
   1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
   2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation

2. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound

3. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
   1. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
      1. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
   2. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
2. The proposal for Garlick's Arch was added to the draft Local Plan without any prior consultation under Regulation 1

4. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer. These include Electricity Grid supply problems and foulsewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

5. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

1. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

1. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

2. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a piecemeal basis.

3. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

6. The status of the text which accompanies each policy box is not If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/663  Respondent: 10952705 / Moira Maidment  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council's refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement 'Conservatives Say Green Belt To Stay', the ruling party on
GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3783  Respondent: 10952769 / Martha Wilkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write this email to register my objection to the draft Guildford Development Plan. Overall I feel the scale of this development is too much for the small village of Send.

I object to the development in Policy A44. 1.9a Land West of Winds Ridge and Send Hill site on the following grounds:

- I object on the grounds neither the Council nor Chris Brown own all of the right-of-way into the land in question. My husband and I own a lot of this right-of-way and have chartered land surveyor drawings as well as the deeds to our property documenting this. We will not sell or release this land for development or access.
- I object on the grounds the site is not large enough for the proposed use.
- I object on the grounds that it would have a detrimental impact on the wildlife, some of which is endangered; there are little owls, bats, slow worms and crested newts on the ground in question among many other species
- I object on the grounds the proposed site is not fit for development as more than half of it is landfill and contains harmful multiple different types of asbestos waste which will be dangerous to disturb and remove. What assurances can Guildford Borough Council and, the developer in question, give that there would be zero health risk to existing residents as a result of this proposed new development?
- I object on the grounds that Send is in the green belt. The proposed inset is inappropriate due to its permanent green belt status
- I object on the grounds that Send Hill is a narrow road and goes down to a single lane on one end and cannot support this extra traffic. It already suffers from bad congestion, especially during school times.

Additionally, I object to the plan for a new interchange with the A3 at Burnt Common as Send would have to take traffic from the proposed 2,000 new houses at the Wisely Airfield, 2,000 houses at Gosden Hill, Burpham and 1,850 at Blackwell Farm. Much of this traffic to and from the A3, M25, Woking and Guildford would go through Send. Send Road is already...
very congested, would become gridlocked (as it does sometimes now with any road-works). Noise and pollution levels, already at excess levels would worsen. The impact would continue through to Old Woking, which also suffers from major congestion.

I request that my comments are shown to the Planning Inspector who will make the decision on the Guildford Local Plan. Please confirm receipt of this email.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3544  Respondent: 10952769 / Martha Wilkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A43: Land at Garlick’s Arch, Send March

Now 400 homes and 6 Travelling Show People plots

- I object to the Policy A43 change at Garlick’s Arch because:
  - It ignores all the thousands of previous objections made by local people
  - There is no proven demand for Travelling Show People plots in this location
  - It is beautiful permanent Green Belt and no “exceptional circumstances” exist
  - It will cause over-development of our village and the number of homes is excessive
  - It is exquisite ancient woodland that existed at the time of Elizabeth 1
  - It will join up Ripley and Send and defeat the key purpose of Green Belt
  - It is contaminated by lead shot accumulated over fifty years
  - It will generate excessive traffic that will block up the local roads of Send and Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3541  Respondent: 10952769 / Martha Wilkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A44
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A44 change because:
- Its continued inclusion ignores all of our previous objections which include:
  o The fact that my husband and I own part of the right-of-way onto the land. We have drawings that prove our land goes beyond the boundary line of our hedge. We have never received a response to this from Guildford Borough Council
  o the loss of rare wildlife
- The contamination. The site is a former land fill containing different levels of asbestos. How can residents be assured that if development is undertaken, this will be safely removed without any health risks to us.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/3545  **Respondent:** 10952769 / Martha Wilkinson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Burnt Common, London Road, Policy A58. Now a new allocation for a minimum of 7,000 sq m of industrial or warehousing

I object to Policy A 58 at Burnt Common because:
- It was deleted from the 2014 draft because of all the objections made previously
- The word “minimum” is a change from the previous “maximum” in the 2016 plan
- and since that time there has been a decline in demand for industrial land
- There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt
The impact on small surrounding roads will create traffic gridlock
- It will join up existing villages and defeat the purpose of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [Comment ID: pslp171/1743  Respondent: 10952769 / Martha Wilkinson  Agent: ]

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is subject to frequent flooding and is currently a flood zone 2 allocation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [Comment ID: PSLPA16/3715  Respondent: 10952897 / Mary Ellen Foley  Agent: ]

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

While I recognize that growth is an issue for the south of England generally and all must play a part in accommodating that growth, I object to the terms in which the GBC Local Plan 2016 is addressing housing needs by siting 1100 new homes and a school on Green Belt land in Normandy; I object for reasons having to do with environment, transport, health (access to NHS services), education needs, and balance of growth across the Borough, itemized below. That my objections span several topics suggests, by itself, that the proposed development – only lately added to the Local Plan – is problematic.

ENVIRONMENT

* Surrey County Council led the way in Green Belt policies, and can almost be said to have invented the Green Belt, in part to preserve wildlife. GBC’s unneeded encroachment into the Green Belt does the Surrey County Council no service and endangers a list of species.

* Since the UK has voted to leave the EU, our environment will no longer enjoy EU protections; we must therefore be all the more careful to conserve what is left of the Green Belt.
* I am most concerned about the deleterious effect of development on stag beetles and skylarks, but these are part of an ecosystem, and the whole must be preserved.

* Those homes will worsen light pollution, affecting the Surrey Hills Area of Outstanding Natural Beauty.

* It makes no sense to build in an area with surface water flooding. I looked at a house on the edge of this area when I bought in Normandy Parish, and sank to the ankle in the water in the lawn. If I wouldn’t buy a house in that area, why would the GBC want to buy 1100?

**TRANSPORT**

* At rush hour, the A323 already works at capacity; tailbacks are common during commute hours. A crash or a closed lane on the A3 (or other arteries brings) the A323 to a standstill. The vehicles from 1100 new homes will tip us into urban-style traffic chaos.

* Residents of this development will necessarily be commuters (no local job growth is expected); those who don’t go by road will ride the train. Wanborough Station has space to park 10 cars, and commensurate station facilities – it is inadequate to support the proposed development.

* GBC objected to burdening the A323 with the traffic from the nearly 4000 homes planned for the Wellesley Barracks when Rushmore Borough Council set out its Plan. The A323 (and other local roads) now must cope with their previous load and the objectionable-to-GBC traffic from Wellesley Barracks; why would it make sense to add the traffic from the proposed 1100 new homes?

* The proposed school will drive up traffic; residents’ children will in existing schools until the proposed secondary is completed, and will presumably stay there, as will their younger siblings. It will be half a generation, if ever, before the school is used by local children. Until then, students (if any, given the number of open school places nearby) will be coming in by road.

* Traffic flow changes in the pipeline, intended to keep traffic out of Guildford town centre, will also put extra load onto country lanes in Normandy; this doesn't seem to be reflected in the Local Plan.

**HEALTH (access to NHS services)**

* The Fairlands Practice is barely coping with Normandy residents as it is (due in part to new NHS financial restrictions). Staff there say they cannot accommodate the residents of 1100 new homes.

* Road conditions already mentioned may restrict the response time of ambulances and other EMTs.

**EDUCATION**

* This development is predicated upon the need for a secondary school in the area. There is no such need. To build a school on Green Belt is to make a sacrifice; we should only suffer that loss if there's a greater need.

* Area schools are undersubscribed at present, some dramatically so (one secondary is only 43% filled).

* At least two of the nearest secondaries have room to expand and are happy to expand if needed.

* The new school is to have seven forms of entry, yet reports quote GBC as saying that number is a guess. We cannot sacrifice Green Belt for a school when the need hasn't been properly assessed.

* Surrey County Council has already stated that Blackwell Farm is a more suitable venue for a school.
Balanced Growth

* With an Officially Assessed Need (OAN) of 690 homes per year, even accounting for the present backlog, the Local Plan as it stands now puts 100% of the responsibility for more than a year of the new housing burden of GBC onto Normandy, all in one blow. With 23 parishes in the borough, this is not balanced growth.

* With a growth rate of well under 1% for the UK, even accounting for the higher rate of growth in the southeast, asking Normandy to accept 100% growth – because the Local Plan doubles the village population – is not balanced, sensible growth.

* We all have a responsibility to help house both stationary and travelling residents; that’s a given, that’s just, and that’s the law. But with the new travellers’ sites added in the last few years and new homes in other parts of the village, Normandy has already done its part, and more, to house new GBC residents; Normandy cannot be designated as disposable countryside, the place where GBC can build anything it needs, even if it means disregarding the Green Belt. The burden should be shared by all parishes.

On these grounds, I object to the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLP16/1050  Respondent: 10953089 / Jeanette Grey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
- destroy views from the Hog’s Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt increase tail backs on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1890  Respondent: 10953217 / Tim Gordon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to object to the planning proposals for new housing in Horsley.

It seems that the local plan does not make the necessary inclusions for the local infrastructure. Schools, doctors, parking facilities etc. It is just housing. The infrastructure is already pushed to the limits. This situation is only going to make it worse.

The green belt should also be protected. It is very important to the future of our children and their children's children.

Also with the current drainage and flooding issues already encountered, more housing is only going to make this worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/3742</th>
<th>Respondent: 10953249 / Charlotte Ladd</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.
A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15806  
Respondent: 10953249 / Charlotte Ladd  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15827  
Respondent: 10953249 / Charlotte Ladd  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 1406 of 2167
I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and
general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/15805  Respondent: 10953249 / Charlotte Ladd  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15834  Respondent: 10953249 / Charlotte Ladd  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable
forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15816  Respondent: 10953249 / Charlotte Ladd  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15821  Respondent: 10953249 / Charlotte Ladd  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15831  Respondent: 10953249 / Charlotte Ladd  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”
The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations I are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.
Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15812  Respondent: 10953249 / Charlotte Ladd  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15815  Respondent: 10953249 / Charlotte Ladd  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15790  Respondent: 10953249 / Charlotte Ladd  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from
the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/15795 Respondent: 10953249 / Charlotte Ladd Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15784 Respondent: 10953249 / Charlotte Ladd Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be
taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15787  Respondent: 10953249 / Charlotte Ladd  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible
change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2910  Respondent: 10953377 / Rosemary Sallis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing to object to several planned developments as part of Guildford Borough Council's local plans. Specifically, I object to:

1. I object to Send village being removed from the green belt as this would surely open the way for future large developments in Send, thereby removing the village feel from Send and allowing there to be no buffer between Woking and Guildford.

2. I object to the building of 45 houses at Clockbarn Nurseries due to the lack of suitable access to this site. As with previous proposed developments, access via Tannery Lane is not appropriate as this road is very narrow and the junction on Send Road with increased traffic is likely to become hazardous, especially at rush hour. In addition, this site is directly behind our house and is currently heavily populated with trees. Removal of any of these trees would negatively impact the enjoyment of our property due to being potentially overlooked and could impact exposure to pollution as these provide a much needed buffer to the road pollution.

3. I object to the building of 400 houses and industrial space at Garlick’s Arch. Apart from the risk to flooding of this area, the current highway infrastructure can not cope with the additional traffic, especially for large lorries that will visit the industrial site. Send Road already has a fair amount of HGV traffic coming to and from Woking (and often at more than 30 mph) and an increase it this will see traffic build up and make the road more dangerous to cross (the road does not have any designated crossings other than the junction with Send Marsh Road) and there is currently no traffic calming measures to control speeding.

4. I object to the development of 40 houses and 2 travellers' pitches at Send Hill. This green belt area is currently a popular walking area for dogs and runners and is not suitable for such as a development due to the single access road. Also, the subsoil of this site is not suitable as it contains documented unsafe landfill waste registered at GBC.

5. I object to a new interchange with the A3 at Burnt Common. This proposed development as the potential to allow cars to use this for a direct access to Woking, including the new planned developments at Wisley Airfield, Gosden Hill and Blackwell Farm. This will increase the volume of traffic in Send Road as traffic that currently exits and enters the A3 through Ripley (using Newark Lane as access to Woking) will now use Send Road. We experienced an awful traffic situation when Newark Lane was closed for bridge repairs and therefore, we would not want to see this repeated if more traffic coming from the A3 at Burnt Common. The road can not cope with the increased traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2318  Respondent: 10953569 / Karen Church  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write with reference to the draft local plan and its impact on the Green belt and in particular the villages of Ripley and Send. I am a resident in Send Marsh and moved to this area three years ago specifically because it was in the green belt and therefore should be protected from over development. Whilst I can understand the need for some expansion in the housing stock and I am encouraged by the number of brownfield sites in the local plan, the proposed 400 houses and 7000 sq m of industrial units and warehousing at Garlick’ Arch, Burnt Common on green belt land is completely over the top. It is not in keeping with the housing density of the surrounding area and there are no plans to increase any services to support the potential 800 people and their children that could live there. The road network around Ripley and Send cannot support the extra traffic that this number of properties would generate. There are already long queues through all the villages with the
current population. The proposed A3 slip road access at Burnt Common will do little to reduce this traffic as people will not want to join the A3 at Burnt Common to head north as there is always a queue caused by the M25 junction, instead they will travel along the Portsmouth road through Ripley village to jump the queue as so many drivers do now when there is heavy traffic. There is mention of improvements to the M25 junction but no details are given. As the majority of Guildford borough is within the green belt, are the Governments figures for the number of houses that are required to be built reduced?

In short, I object to any green belt land being used for development and in particular the villages of Ripley, Send and Clandon being inset from the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3764  Respondent: 10953569 / Karen Church  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write with reference to the local plan and in particular the changes to the site A43 Land at Garlick's Arch, Send Marsh Burnt Common and Ripley. In section 4.2 Housing Policies, Policy H1 section 7 states:

(7) Accommodation for Gypsy, Traveller or Travelling Showpeople (whether they meet the Planning Policy for Traveller Sites definition or not) accommodation should be provided on development sites of 500 homes or more whilst there remains an identified need. For 500 to 999 homes two pitches or plots should be provided, for 1,000 to 1,499 homes four pitches or plots, for 1,500 to 1,999 homes six pitches or plots and for 2,000 or more homes eight pitches or plots.

The land at Garlick's Arch is proposed to have 400 new homes built on it making it too small a development to include accommodation for travelling show people.

The impact of the 400 new homes (excessive for the size of the site and surrounding area) in the small village of Send and the impact on the traffic on the Portsmouth road can only be made even worse with the addition of the large vehicles, that usually travel in convoy, that are associated with travelling show people.

The future of the area and indeed the whole country is going through a period of extreme change and uncertainty following the country's decision to leave the European union. Foreign investors who bought property and left it standing empty purely because it would increase in percentage value better than any bank interest rate have stopped buying property. There has also been a slowdown in migration into Britain from EU countries. This will reduce the strain on the housing market and hopefully the government will put steps in place to get some of the hundreds of thousands of empty properties in the country available to rent or buy. I strongly believe we should protect our green belt land and keep our villages within it. There are may steps that can be taken to improve the housing situation without concreting over the south east of England.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4208  Respondent: 10953793 / Hugh Thomas  Agent:
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<td>I OBJECT to the proposals for Gosden Hill because they breach the Green Belt, put West Clandon in danger of being joined up to Guildford and will generate excessive extra traffic for Send.</td>
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<td>I OBJECT to the proposals for Blackwell Farm because they breach the Green Belt, the housing numbers are excessive, damage would be caused to the Surrey Hills AONB and excessive extra traffic would be inflicted on Send.</td>
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<th>10953793 / Hugh Thomas</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I OBJECT to Wisley Airfield, which is classified as a brownfield site on a spurious technicality when everybody can see that it is not what is understood by brownfield, being included in the Local Plan as a development site for 2000 houses when Guildford Planning Committee have just refused the planning application relating to it. Either the left hand does not know what the right hand is doing or this is a devious diversion. I object for all the reasons identified by GBC Planning Committee when it rejected the application.</td>
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I OBJECT to building 2000 houses at what GBC calls Wisley but is actually at Ockham, because it would massively and
detrimentally overwhelm Ockham village, East and West Horsley and the entire neighbouring area. The proposal is ill
conceived, showing scant regard for the Green Belt, infrastructure requirements, transport, or pollution and lacking nearly
all the evidence that is needed to show that such a development would be sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4203  Respondent: 10953793 / Hugh Thomas  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the building of 45 houses on the Clockbarn site in Send (ref A42) which is designated as agricultural land
within the Green Belt. The fact that it has been allowed to deteriorate should not be a passport to changing its status. It is
not suitable because it has poor access and the road cannot take the additional vehicular traffic which 45 houses would
generate.

I OBJECT to the Building of 45 houses on Clockbarn because the road already suffers from serious overload, as previously
accepted by Surrey County Council. An additional 45 houses would increase the number of dwellings in Tannery Lane by
nearly 400% because planning permission already exists for 63 apartments at the Tannery business centre site under
reference 14/P/00575 and 00576 as amended. It is disingenuous for GBC to express the belief that these may not be built.
GBC gave permission and the owner has the right and locally it is understood the intention of building them. Indeed work
has commenced. Added to this would be the traffic generated by building and servicing the new narrow boat basin or
“marina” under reference 14/P/00289. The road cannot cope with the traffic volume it currently has and could not possibly
accommodate the massive increase in vehicular traffic consequent on these three developments. In simple terms if the
number of dwellings increased by 400% so would the volume of domestic traffic in addition to an increase in commercial
traffic. This does not bear thinking about.

I OBJECT to the building of 45 houses on Clockbarn because this massive increase in traffic would severely impact the
junction of Tannery Lane and Send Road where there is a problem every day because of poor visibility for traffic emerging
from the side road causing danger and congestion to traffic on the main road. The suggestion that this would be alleviated
by traffic lights is completely wrong as the installation of temporary traffic lights in Send Road earlier this month
demonstrated. When traffic has to stop in either direction, as it does for traffic lights, Send Road quickly gets gridlocked.

I OBJECT to the building of 45 houses on Clockbarn because it fails to take into account the cumulative impact on traffic
volumes in the rest of Tannery Lane. Tannery Lane is very narrow, twisty and dangerous for its entire length. Much of it is
single track with passing places and blind spots. There is a problem all the way down with vehicles trying to pass each
other. When they meet they very often have to reverse in order to find a passing place. The problem is exacerbated by the
high proportion of HGVs and large commercial vehicles currently going to the business centre, and destined to increase
when the narrow boat basin is built. Tannery Lane is also very long. The biggest problem, which is often overlooked
because planners fail to go there, is the stretch beyond the business centre going north. The final stretch of Tannery Lane
before it joins Polesden Lane is only 9 feet wide for a distance of nearly 400 metres and cannot be made wider because of
the nature reserve. A significant proportion of the traffic, estimated at about one third, enters Tannery Lane via Polesden
Lane or Papercourt Lane which are themselves extremely narrow, especially Papercourt where some of the front garden
boundaries on either side of the road are within little more than three metres of each other. There is also the extremely
dangerous blind bend to the right when joining Newark Lane. These lanes were not meant for the high number of cars, vans
and lorries which currently use them and could not possibly cope with an increase of the amount which would follow from this development, on top of the others.

The suggestion sometimes made that Tannery Lane could be widened totally fails to appreciate the constraints which exist. Any attempt to widen it would be defeated by the fact that the entrance from Send Road does not provide space for any significant widening; the Papercourt Lane exit is so narrow that front gardens on both sides of the lane would have to be compulsorily purchased; the stretch from Prews Farm Cottages to Papercourt Farm runs immediately alongside Papercourt Marshes so there is no scope for widening and in any event further traffic would damage Papercourt Marshes; the stretch from Papercourt Farm to the junction with Polesden Lane is single track nine feet wide which also runs alongside Papercourt Marshes. In any event a widening of Tannery and Papercourt by itself would be insufficient - because of the bends it would need to be straightened as well, a hugely expensive and well-nigh impossible task. In the whole of the Borough of Guildford, if one set out to find somewhere to build houses, Tannery Lane would be close to the bottom of the list of potential sites from the point of view of road access.

I OBJECT to the building of 45 houses on Clockbarn because there are virtually no pavements. The increase in traffic would therefore mean that pedestrians would face much greater risk. The only surfaced pavement in Tannery Lane is the first short section from Send Road confined to the north side. The other side is unsurfaced. After Peasblossom Cottage (about 80 metres from the junction with Send Road) there are no further pavements on either side for its entirety. Pedestrians walk in the road and have to dodge the traffic as best they can.

In addition to vehicular traffic it is used by residents and their visitors on foot: residents from Send Road and adjacent roads walking their dogs; walking groups and ramblers (on their way to Newark Priory, Ockham Mill and the Pyrford Water Meadows); equestrians; sports and recreational cyclists (because it is in the guide books as part of the cycling network based on Ripley); and anglers who fish in the Wey Navigation. It is therefore enjoyed by a lot of people whose safety should not be further jeopardised, and for whom a village amenity should not be ruined completely, by increasing any more the excessive number of vehicles the road already has to cope with.

Tannery Lane is an ancient rural road which is rich in wildlife which should not be damaged by pollution caused by increased traffic volumes. Clockbarn itself is a nesting habitat for bats which are a protected species, making it not only unsuitable to build there but a criminal offence to do so. Additional traffic pollution and noise alongside Papercourt Marshes will be detrimental to wildlife there too.

I OBJECT to building 45 houses at Clockbarn because all the land in that area is prone to flooding. Although the Environment Agency maps include the area in flood zone 1 the reality is different, as a great deal of photographic evidence and local testimony can show.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to 400 houses and 7000 sq metres of industrial space at Garlick’s Arch being brought forward as a last minute proposal without any warning and without it having been mentioned at all in the earlier Draft Local Plan. This attempt to push it through under Regulation 19 instead of Regulation 18 and thereby deny residents a proper process of consultation is a further manifestation of the contempt in which Guildford Councillors hold the electorate. This is a clear breach of administrative law.

I OBJECT to building 400 houses and 7000 sq metres of industrial space at Garlick’s Arch because the site includes ancient woodland, too valuable to destroy. The site floods as photographic evidence and local testimony can confirm as a result of the East Clandon stream overflowing and surface water being trapped.

I OBJECT to building 400 houses and 7000 sq metres of industrial space at Garlick’s Arch since this would increase the number of dwellings in Send (including Send Marsh and Burnt Common) by about 25% without a commensurate increase in services and infrastructure. There is already severe pressure on doctors’ surgeries, school places and other essential facilities which would seriously worsen. Infrastructure issues are substantially the responsibility of Surrey County Council but there is no evidence that SCC has formulated an infrastructure plan, or the means by which the infrastructure would be paid for, in respect of this site or any other site. What we were told at one public meeting, that the council thinks about infrastructure afterwards, is typical of a woefully inadequate approach to the whole Local Plan.

I OBJECT to 7000 sq metres of industrial space at Garlick’s Arch because the space is not needed since there is inadequate take up of existing space in the area, but if it were needed it would make very much more sense to locate it at Slyfield. In any event Garlick’s Arch is an unsuitable location for industrial space given the proximity of existing houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4206  Respondent: 10953793 / Hugh Thomas  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to a new interchange with the A3 at Burnt Common because Send would have to take traffic from the proposed 2000 houses at Wisley Airfield, 2000 at Gosden Hill and 1850 at Blackwell Farm as well as 485 from Send itself. This is in addition to what it takes at the moment. Much of this traffic to and fro the A3, M25, Woking and Guildford would go through Send. Send Road, which is already overloaded, would face gridlock. This would exacerbate noise and pollution levels which are already excessive and is wholly unacceptable.

I OBJECT to the new interchange with the A3 at Burnt Common because it is being presented as a way of facilitating the movement of a massive increase in vehicles whereas in reality it would cause havoc on the A247 and the many feeder roads in Ripley and Clandon in addition to Send.

I OBJECT to the fact that Guildford Councillors approved the Local Plan before the Transport Assessment had even been published which indicates what scant regard they had for the traffic implications which are at the forefront of residents’ worries. They have to contend with the problem every day in terms of delays, pollution and noise which are already destroying our villages as decent places in which to live.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPS16/4204  Respondent: 10953793 / Hugh Thomas  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the development of 40 houses and 2 travellers’ pitches on Send Hill because the location is unsuitable. The subsoil of the proposed site contains unsafe landfill waste dating back to the 1960s when it was shown on Ordnance Survey maps as “refuse and slag heap”. The date of the landfill pre-dates the EU Landfill Regulations in 1999 but it was registered at GBC from 2005 onwards. Any disturbance could be a health hazard due to unknown substances which are also described as “unrestricted”. It would be dangerous to local residents for this hazardous waste to be disturbed. The site should, therefore, never have been brought forward for consideration. It would definitely not be sufficient to “condition” it as GBC is prone to doing.

I OBJECT to the proposed development at Send Hill since it does not appear to be in accordance with The Government’s 2015 guidelines on traveller sites. GBC’s Traveller Accommodation Assessment of 2012 is acknowledged in their 2016 Sustainability Appraisal as being out of date which has resulted in an over allocation of traveller sites. GBC needed to re-examine its evidence base before coming forward with this proposal in the Local Plan. It seriously failed in its duty of care by not doing so.

I OBJECT to the proposed development at Send Hill because it is on a narrow country road with inadequate on road parking, it is in the Green Belt, near a nature reserve and an amenity area of beautiful countryside. It is an unsuitable location which has been introduced into the Local Plan at the last minute without first doing proper research on the history and characteristics of the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8847  Respondent: 10953793 / Hugh Thomas  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the Local Plan because it seeks to build on Green Belt land unnecessarily. The work of Professor Anne Power at the London School of Economics, amongst much other expert research, clearly demonstrates that there is more than sufficient land to build all the houses that are needed without taking any of the Green Belt. In our area several studies show that unused brownfield sites in Guildford Town itself are capable of yielding most of the required land. GBC has not properly explored the capacity which is available there or on brownfield sites elsewhere in the borough, which would have provided a sensible starting point since GBC own many of them.

I OBJECT to the Local Plan in that GBC’s approach to the Green Belt introduces a concept of grading its quality. This is an alien concept, not recognised in law. Of course some Green Belt is seen to be better than other Green Belt but the law does not make any distinction, nor should it. It depends who is looking at it and from what standpoint they are looking. Green Belt is Green Belt and it is not for GBC to stand in judgement on what bits it thinks are worth keeping and what are not.

I OBJECT to removing Send and other villages from the Green Belt. The Green Belt was intended to be permanent, and its permanence was enshrined in law through the National Planning Policy Framework, reinforced by the NPPG and a succession of Ministerial guidance statements. For all of this to be overridden requires “special circumstances” which do not exist in the case of Send.

I OBJECT to all four proposed sites in Send because they are all in the Green Belt and not one of them displays the very special circumstances which would be needed in order to outweigh the substantial harm caused by reason of inappropriateness.

I OBJECT to any sort of diminution of Send’s Green Belt because it provides an essential buffer stopping Woking and Guildford becoming one conurbation. It has served this purpose effectively since its inception and should continue doing so for the benefit of subsequent generations living here. No group of councillors, especially without a mandate, has the authority to impose a different future on residents.

I OBJECT to any reduction in Send’s Green Belt because so much land in Send provides the setting for the beautiful Wey Navigation corridor, which is a conservation area that enhances biodiversity, is visually important, provides a valuable leisure facility and combined with the surrounding lakes an exceptional habitat for a wide range of bird species and other wildlife.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8848  Respondent: 10953793 / Hugh Thomas  Agent:   

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2   

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to GBC withholding from residents their consultant’s and sub-consultant’s calculations of housing need, which is what is driving this whole issue. It would appear that even some individual councillors are not privy to the calculations or how the total has been reached but are blindly accepting a figure produced without workings or explanation. There are strong grounds for believing that GBC, aided and abetted by their consultants, have overstated by a wide margin what the figure should be. There are also grounds for believing that the numbers have been exaggerated as a result of pressure from developers. As the grabbing of Green Belt land is predicated on the need for a particular number of houses, a good starting point would have been to get the number right and to show transparently how it was reached.
Other submissions will provide supporting statistics and there are authoritative figures online to show the escalation of housing need in Guildford Borough has been about 0.5% per year for the last ten years. The draft plan provides no proper data which proves that it is increasing significantly more at the moment or that in future years it will rise by so much more. Guildford’s projected number in the last draft local plan was challenged by the Office of National Statistics which is a more reliable source since it is not driven by developers. Since the current set of figures was published other underlying data has changed; for example it was too late to take into account the effects on housing demand of changes to the population which could arise from Brexit. Nor has GBC applied the normal constraints to their maximum projections. For a proper professional assessment of housing numbers I refer the reader to the submission from Andrew Procter on behalf of the Save Send Action group.

I OBJECT to the combined total of 2000 (Wisley) + 485 (Send) + 2000 (Gosden Hill) + 1850 (Blackwell Farm) houses all alongside a short stretch of the A3 between the M25 and the university. To concentrate 6335 of the borough’s assessed need for housing of 13860, that is close to half of it, in such a small area of the borough is by any standards unreasonable. If GBC wants to build this number of houses, which has more to do with developer pressure than properly calculated need, it should spread them more evenly throughout the borough, which it is manifestly failing to do. This would help to alleviate excessive traffic congestion and pollution which is a certain consequence of GBC’s current proposals.

The housing number calculations also have to take into account the constraints, in particular those resulting from the Green Belt. The NPPF states that in their local plans local authorities are required to meet objectively assessed housing needs “as far as is consistent with the policies set out in this Framework”. The policies referred to include Section 9 - Protection of the Green Belt. The Court of Appeal has clarified the interpretation of this by stating categorically that there may be nothing very special about a housing shortfall in an area which has very little undeveloped land outside the Green Belt.

The key question is not “is there a shortfall in housing land supply?” You have to ask “have special circumstances been demonstrated to outweigh the Green Belt objection?” And such circumstances are not demonstrated simply because there is a less than five year supply of housing land. Special circumstances will not exist unless the potential harm to the Green Belt is clearly outweighed by other considerations. Given the large amount of Green Belt in Guildford Borough, the council can legitimately argue that it does not have to match the housing targets of boroughs with less Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2103  Respondent: 10953921 / Alan Knox  Agent: Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed Infrastructure Schedule (Appendix C)

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/2104  Respondent: 10953921 / Alan Knox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPS16/4192  Respondent: 10953921 / Alan Knox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Garlick's Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the the Draft Local Plan Infrastructure schedule does not provide for this site at all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4193  Respondent: 10953921 / Alan Knox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic

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<td>I object to the lack of proper infrastructure planning for sites (Policy I1)</td>
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<td>The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools?</td>
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<td>I object to the congestion that development will cause to the trunk roads A3/M25 (Policy I2)</td>
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<td>Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.</td>
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I object to poor air quality concerns (Policy 13)

The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8807  Respondent: 10953921 / Alan Knox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8809  Respondent: 10953921 / Alan Knox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I object to the local plan as the development proposed is not sustainable (Policy S1)</td>
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<td>The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrasctucture. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?</td>
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<td>I object to the Borough Wide Strategy (Policy S2)</td>
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<td>There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt increase tail backs on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5642  Respondent: 10953953 / David Grey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to you concerning the above and that I object on all counts but particularly to the Blackwell Farms proposed development and the SANG application in Frog Grove Lane, Wood Street Village. My objections are wide ranging but revolve around the fact that the plan seems "hell bent" on developing on Green Belt and on areas of Outstanding Natural Beauty. More attention could be applied on using "Brown Field" sites and on utilising land that has redundant buildings on it - e.g. - The Hare & Hounds, Broad Street & The Duke of Normandy, Normandy. Furthermore, the mammoth work involved in correcting transport links and all services is woefully short sighted - more effort should be directed at improving public transport and the like.

Needless, to say my objections could go considerably further but hopefully the above "brief" is enough to register my objection and complete dissatisfaction

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3606  Respondent: 10954049 / Melanie Grant  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing to place my **strong objection** to the Proposed Submission Local Plan: Strategies and sites: June 2016 which includes removing East and West Horsley villages from the Green Belt by "insetting". As a permanent resident of West Horsley for almost 5 years I am very unhappy about the proposal of losing the green belt status that made us want to live here in the first place. Within P2 there is no declaration of support for protecting the Green Belt contrary to NPPF and government statements and there has clearly been no evaluation of the value of local Green Belt as an asset. The excessive level of development proposed is in breach of views expressed in the last consultation and Conservative party manifesto commitments in last election.

The existing village infrastructure has NO capacity for extra housing and the additional people/vehicles that brings - the roads are already too busy, many in need of significant repair due to extent of use (for example East Lane) and many (in particular Ockham Road North) experience significant flooding when there is any continual rain indicating drainage is already at capacity. Additional housing with paving/driveways etc made way for by removing fields, trees, vegetation will only exacerbate this further. There is no way the existing roads can be expanded to take additional capacity - the majority already have housing plots and narrow pavements on both sides. The local primary school is already at capacity and I have no interest in additional schools being added - I want my children to be able to attend the existing reputable local village school and further down the road the Howard.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPS16/4290  Respondent: 10954209 / Anita Wilkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A36

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to these policies

Utterly disproportionate! The impact of clustering of such huge numbers of dwellings in a low density Village area is tantamount to vandalism., A thinner spread, based on demonstrable figures, across the whole borough might have lesser impact does not seem to have been considered. This part of the borough appears to have been selected for a disproportionate burden.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPS16/4289  Respondent: 10954209 / Anita Wilkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to this policy

Comments: gridlock on the Portsmouth road, particularly when considered together with the Wisley Airfield proposal!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPS16/4291  Respondent:  10954209 /  Anita Wilkinson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

[Response has been redacted as it may be considered defamatory, derogatory, inflammatory or offensive in nature.]

[Summary of redacted text: I OBJECT to the inclusion of this site. Firstly I am objecting to the inclusion of a matter that should be dealt with through appropriate channels of planning application. This Draft Plan is a policy document and as such the application to and inclusion of a specific site with a longstanding planning history is inappropriate. The site should be dealt with through the planning application process. The site has been developed without planning permission and enforcement action has been taken in the past. The Draft Plan appears to condone this approach and undermines the planning permission process and the work of planning officers. It rewards Green Belt development and discounts the importance of farmland. It ignores Policy E of the guidance “planning Policy for the Green traveller sites’ which states “Traveller sites (temporary or permanent) in the Green Belt are inappropriate development”. I request that this Policy be removed from the Draft Plan.]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/9248  Respondent:  10954209 /  Anita Wilkinson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT to this policy:

Comments: Asserting unmet housing need is not an argument for building on green belt land. Much of this land is farmland, burying it under tarmac, is an insane policy when food security is precarious and may become more so, it would be negligent not to consider the needs of future generations. The sacrifice of green belt to produce commuter dormitories
cannot be justified. The attempt to justify building on Green Belt ‘in order to facilitate the development that is needed’ is vague and not supported by guidance from Nick Boles office.

It is disingenuous to move to remove villages from the Green Belt, encourage development and then state that only 1.6% of the borough’s Green Belt will be lost. The extreme elasticity of the definition of ‘permanently’ and ‘permanence’ expressed in this document is reminiscent of Alice in Wonderland

“When I use a word,” Humpty Dumpty said, in rather a scornful tone, “it means just what I choose it to mean—neither more nor less.” “The question is,” said Alice, “whether you can make words mean so many different things.” “The question is,” said Humpty Dumpty, “which is to be master—that's all.” – I would recommend that the authors of the Draft Plan seek guidance from the Oxford English.

Taking Ripley and Send, and other villages out of the Green Belt is completely unacceptable and paves the way for destruction of the Villages in perpetuity, to inflict this burden on residents who live in the Villages and impact the historic and unique quality of the area itself.

The next policy comments reflect my concern that sites are identified for development without attention being paid the overall impact on the local area, the contribution to creating a single highly urbanised area where there were villages of individual character and charm.

I object to the proposed development at Wisley airfield due to environmental impact and destruction of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9246  Respondent: 10954209 / Anita Wilkinson Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy.

Comments: sustainable seems to be whatever the councillors define it as. There exists in the NPPF guidance towards the preservation of the Green Belt. Perhaps the most sustainable move we could make is to protect the ‘lungs of London’, to protect farmland that might be called on to feed a population, and to respect that any cavalier decisions taken today might come with a heavy price for the next generation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
| Comment ID: | PSLPP16/9247  | Respondent: | 10954209 / Anita Wilkinson  | Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
| I OBJECT to the proposal to build 13,860 new homes. |
| Comments: the council has strenuously resisted calls to demonstrate and provide support for these figures. In the absence of which, I can only conclude that there is no justification for them and that the pressure of developers have moulded these from the air and greedy dreams. In the light of recent political change I would suggest that a new set of figures might be indicated, perhaps reflecting real figures. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

| Comment ID: | pslp172/96  | Respondent: | 10954465 / Lee Warner  | Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2017 / Policy A26 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
| We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which: |
| • disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8] |
| • directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas |
| • ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a] |
| • adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

| Comment ID: | PSLPS16/921  | Respondent: | 10954817 / Sue Graves  | Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy A35 |
Objection to Guildford Borough Council draft Local Plan and to the inclusion in the plan of Site Allocation A35 - the Former Wisley Airfield - for a new settlement with 2,000 dwellings

As a lifelong resident of Cobham, just over the border in the Elmbridge Council area, I would be directly adversely affected by the proposal in your new local plan to remove the Former Wisley Airfield site from the Green Belt. I wish to object strongly to this proposal on the following grounds:

- The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford.
- No exceptional circumstances have been established to warrant removing the site from the Metropolitan Green Belt.
- There is ample brownfield land in urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.
- The harmful impact on transport, local roads and road safety by the suggested development has not been taken into account. The increased traffic would cause congestion and danger on the narrow rural roads in Ockham, Hatchford, Downside and Cobham. Cobham is the closest shopping centre to the proposed development. The village could not cope with the additional traffic and car parking involved in serving some 5,000 additional Wisley residents, and would experience a significant increase in stationary/idling traffic at peak times and at junctions. Even with current traffic levels, Cobham centre is often gridlocked at peak times of day, especially if there are problems on the M25 or A3.
- There is a lack of suitable public transport, which the Plan does not address. The local rail stations of Effingham and Horsley could not cope with the proposed increase in passenger traffic and car parking is already at capacity. In the refused planning application there had been a suggestion that Cobham & Stoke D’Abernon Station could be used. That or use of stations further north at Weybridge or Walton would increase congestion and pollution on local roads in Elmbridge.
- The issue of air quality is not being taken seriously. Air pollution in this area in the north of the Borough of Guildford and the south of the Borough of Elmbridge and particularly near the M25/A3 junction already exceeds EU-permitted levels. Additional traffic would worsen the situation, affecting the health of all current and future residents.
- The environmental and ecological value of the site and the area around it is being underplayed in the Plan. Consideration should be given to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

For these reasons, I wish to object strongly to the inclusion of the Wisley site in the new Guildford Plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I OBJECT to the Settlement Boundary which has been imposed on East Clandon without any consultation. This imposition provides no protection to further development outside of the settlement boundary (Policy P2 para 4.3.25) and is unnecessary in an already tightly developed ancient and rural conservation village. This proposal would endanger the openness of the Green Belt, the views in and out of the AONB (protection of the AONB Policy P1) and the character of the village.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>Policy D4: I OBJECT to the insetting of villages (meaning in fact, removal of villages from Green Belt protections) and the fact that they will suffer from higher density development and the resulting increase in traffic and use of infrastructure which is already under pressure. I object in particular to the insetting of West Clandon, Send and the Horsleys. This will have a detrimental impact on the openness of the Green Belt and the views in and out of the AONB in direct contravention of Policy P1 and P2.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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Policy P2 – Green Belt: I OBJECT to this significant erosion of the Green Belt with the proposals for large towns being developed on Green Belt land thereby removing the openness of the Green Belt. The huge developments proposed for the North East quadrant of the borough (Wisley Airfield, Gosden Hill Farm, various farms and tracts in the Horsleys and Garlicks Arch at Send) will have a severely detrimental effect on the amenity of the area.

I OBJECT that Policy P2 is not met where it states that Green Belt should be protected. I object to the disproportionate use of Green Belt land for housing – some 65% of the housing proposed is on Green Belt, with little consideration being given to redevelopment of brown field sites.

I OBJECT to the changes to Green Belt boundaries. This is not justified by any very special circumstances. All the Green Belt sites meet the five purposes of the Green Belt.

I OBJECT to building on the Green Belt because the essential characteristic of Green Belt is its openness and permanence (National Planning Policy Framework paragraph 79).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT that GBC are contravening the NPPF framework stipulation in paragraph 87 with the proposed developments at Gosden Hill Farm, East and West Horsley and Garlicks Arch, Send. Paragraph 87 states “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.” All of the proposed developments are out of proportion to the surrounding area and none qualify for the exceptional circumstances required to take them out of the Green Belt.

I OBJECT specifically to the proposed building on Gosden Hill Farm on Green Belt designated to prevent West Clandon being absorbed into a sprawling urban environment. The proposed development would be four times the size of the village and is completely disproportionate and unjustified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy S1 which doesn’t offer sustainable development as regards roads and rail infrastructure. The current road network doesn’t cope with existing demand, with frequent congestion on the M25 and A3 in particular, and the trains are already overcrowded. No pre-emptive planning has been made to alleviate these problems which will be much exacerbated by large increases in housing in the north-east of the borough.

I am particularly concerned about the impact of additional traffic on narrow winding local roads such as the A247 through West Clandon and the Ripley Road in East Clandon, which is already used as a cut-through to and from the A3. This would be much exacerbated by the proposed huge housing developments in the area which would inevitably result in a large increase in cars and travel.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18306  Respondent: 10954849 / David Hayward  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objection to the Guildford 2016 Local Plan I OBJECT to the 2016 Draft Local Plan as a whole and in particular I object to the specific issues listed below. I believe that this deeply flawed Local Plan will have a direct and detrimental effect on the amenity currently enjoyed by residents of East Clandon, West Clandon, Send Marsh, Ripley, West and East Horsley. It erodes the openness of the Green Belt and endangers the beauty and views in and out of the Surrey Hills AONB.

My specific points are as follows:

I OBJECT to Policy S2 for the proposed provision of the very high overall housing numbers of 13,800 new homes (690 new dwellings being built every year for 20 years). I object on 3 grounds:

these housing numbers have been imposed with no real consultation being undertaken with residents; b. the housing numbers are based on a high-growth economic development plan which in itself has had no consultation and this combined with estimated demand from London residents will turn Guildford into a dormitory town for London; c. no real economic or housing demand factors have been provided by the borough planners to substantiate the very high housing target of 13,800 new dwellings over the next 20 years.

I OBJECT to the proposed scale of new building throughout the borough, which is disproportionate and unjustified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18308  Respondent: 10954849 / David Hayward  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
I OBJECT to the fact that brownfield land would be disproportionately used for commercial development and unnecessary retail expansion. This means Green Belt land is used for housing development unnecessarily;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to the fact that GBC have not met the requirements of the NPPF Paragraph 155 which imposes an explicit obligation to have early and meaningful consultation. In particular, there has not been meaningful consultation on imposing a settlement boundary on East Clandon.

I object to the fact that new sites have been proposed in this consultation which have not previously been considered, which is not appropriate at this stage;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to the fact that GBC have not met the requirements of the NPPF Paragraph 155 which imposes an explicit obligation to have early and meaningful consultation. In particular, there has not been meaningful consultation on imposing a settlement boundary on East Clandon.

I object to the fact that new sites have been proposed in this consultation which have not previously been considered, which is not appropriate at this stage;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
This housing is in an inappropriate location. We should preserve the site for other purposes, the subsequent overloading of facilities will be intolerable: roads, schools, medical facilities and parking will be negatively affected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1103  Respondent: 10954913 / Pete Rollo  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( Yes ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I believe the housing development proposed at Gosden Hill Farm is misguided because it will bring additional burden on overstretched public facilities: road congestion, parking, school places, medical facilities, shops, leisure facilities and transport such as trains and buses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1106  Respondent: 10954913 / Pete Rollo  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( Yes ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This is far too large a development: the consequences will be damaging to the natural environment and will overcrowd roads, schools, public transport and parking and medical services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1108  Respondent: 10954913 / Pete Rollo  Agent:

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<td>I am completely opposed to the Wisley plan as the area is unable to support that style of development: a small housing complex with associated school, dr surgery, shop and parking, play park and nursery for perhaps 150 homes would be acceptable. The impact on local roads, transport and public services would be unacceptable.</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>The developments proposed are quite simply out of all proportion and will neither solve the need for social housing nor affordable homes for young families.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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The local infrastructure is creaking and crumbling already, these plans will simply make it worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13544  Respondent: 10955009 / David Kratt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a resident of East Horsley for over 45 years and a householder for over 20, I wish to register my objection to the proposed local plan. There is simply no need to address the national housing shortage in the way that is being proposed for the Horsleys and certainly not in the way proposed by the development at Wisley airfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4719  Respondent: 10955489 / Ian Carter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt.
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity.
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.

7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).

8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4720  Respondent: 10955489 / Ian Carter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no improvement of these roads will only make the situations worse. Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk roads. The A3 & M25 are already at capacity during peak hours and any development prior to planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

21. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

25. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

26. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

27. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

28. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

29. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.
24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4722  Respondent: 10955489 / Ian Carter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately
half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/3151  Respondent: 10955489 / Ian Carter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp17q/172  Respondent: 10955713 / Christopher Parker  Agent:


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
My comment relates to Policy A25: Gosden Hill Farm, Merrow Lane, Guildford and in particular to the second stated infrastructure requirement that:

"Any proposals for the development of the site should have regard to the potential opportunity to provide an all movements junction of the A3 trunk road with the A3100 London Road, the B2215 London Road and the A247 Clandon Road."

It is unsound that this hugely significant aspect is simply referred to and presented in aspirational terms as a "potential opportunity". The proposed development at Gosden Hill Farm should be contingent upon the timely provision of a new four-way road junction with the A3 during the very early stages of the site development. This would be a junction providing on and off vehicular access to both the south bound and the north bound carriageways of the A3. Though Policy A25 makes it an infrastructure requirement that a new A3 southbound on-slip is provided together with a relocated southbound off-slip there is no such infrastructure requirement for any new access to or from the A3 north bound carriageway. I find this omission to be extraordinary and fundamentally unsound, particularly as I raised this aspect in my previous comment on the Draft Local Plan (see my email dated 22 September 2014). It is unsound that there is no clarification, definition or explanation in Policy A25 of how access to and from the northbound A3 carriageway will be achieved for the eventual residents, visitors and workers of the hugely significant Gosden Hill Farm development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/3942  Respondent: 10955809 / Sarah Roach  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object strongly to Send Village being removed from the Green Belt. The current Green Belt provides a very clear buffer stopping Woking and Guildford merging into one large conurbation. I see no justifiable reason for election promises being broken.

The local plan also proposes the development of Clockbarn Nursery and Garlick’s Arch, to which I object. The additional traffic congestion and demand for additional school places will pose significant demand on already stretched local services and further undermine the quality of life that the current residents enjoy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7354  Respondent: 10955809 / Sarah Roach  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I particularly object to the proposal for 40 houses and traveller’s pitches at Send Hill. The road access and local services are not sufficient and would be a blight on the local area. Simply getting my son to school in Ripley is a traffic nightmare in the mornings and year on year it gets worse. The small roads simply cannot cope.

The level of vandalism proposed by the local plan is unacceptable and must be stopped and elected representatives need to serve those who elected them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4036  Respondent: 10956161 / Pauline McCallister  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed Infrastructure Schedule (Appendix C)
The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4035  Respondent: 10956161 / Pauline McCallister  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the figure of 693 houses per annum in the borough being too high (Appendix D)
With the recent Vote to Leave the EU, housing soon won't be an issue with 2.9 Million people leaving.

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans. How’s that suddenly doubled????

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7507  Respondent: 10956161 / Pauline McCallister  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)
Garlick’s Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for it’s
removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional
circumstance.

The Plan states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt
Common replaced it with Garlick’s Arch.

The site is not appropriate because:
• There is no sustainable transport infrastructure.
• The site is liable to frequent flooding
• It has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.
• There are no plans to improve local schools, medical or utilities to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2636  Respondent: 10956161 / Pauline McCallister  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the inclusion of the land for new on/off ramps at Burnt Common
How would the local roads cope, they are small roads with housing either side, how would a major junction on
and off ramp work when there are just tiny roads feeding/exiting it?

North facing ramps to the A3 at Burnt Common would be a disaster for local communities, which do need to access the A3
to the north, but the addition will draw in a huge amount of ‘through’ traffic. E.g. all traffic from London/M25 to Woking
would go through Burnt Common, Send and Old Woking. This is not sustainable as this cannot be improved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7506  Respondent: 10956161 / Pauline McCallister  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)
How would the local roads cope, they are small roads with housing either side, how would a major junction on and off ramp work when there are just tiny roads feeding/exiting it?

North facing ramps to the A3 at Burnt Common would be a disaster for local communities, which do need to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. E.g. all traffic from London/M25 to Woking would go through Burnt Common, Send and Old Woking. This is not sustainable as this cannot be improved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16736  Respondent: 10956161 / Pauline McCallister  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)
The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16738  Respondent: 10956161 / Pauline McCallister  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2)
There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for their decades employing local people and are therefore clearly sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. I object to the lack of proper infrastructure planning for sites

The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the lack of proper infrastructure planning for sites (Policy I1)
The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. I object due to the congestion that development will cause to the trunk roads, A3/M25
   The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to poor air quality concerns (Policy I3)
The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to not protecting the Green Belt
   I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl.

There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield sites at Burnt Common rather than developing Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I am writing to Guildford Council to express my great concerns on the proposed development of the Green Belt in Surrey.

What give's you the right to remove this land from the green belt?

The NPPF (National Planning Policy Framework) makes it clear that the fundamental aim of the Green Belt policy is to prevent urban sprawl by keeping land permanently open.

It also explicitly states that once established Green Belt boundaries should only be altered in exceptional circumstances.

There are no exceptional circumstances!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!

The whole point of the Green Belt is to stop urban sprawl, your destroying the Green Belt to extend urban sprawl? Insane!

Green Belt Guidelines enclosed as it's obvious you haven't read them.

The UK has voted to leave the EU, so 2.9 million people will be leaving soon, so no reason for all this devastation of the beautiful Surrey Green Belt.

These are pictures taken today of the land proposed to be taken out of the Green Belt for the Housing for Garlick's Arch.
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<tr>
<th>Comment ID: PSLPP16/16733</th>
<th>Respondent: 10956161 / Pauline McCallister</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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I object to not protecting the Green Belt (Policy P2)
I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl.

There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield sites at Burnt Common rather than developing Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 10956161 / Pauline McCallister</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
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</table>

I object to development in areas which are at risk of flooding (Policy P4)
The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

How can the Council's flood risk be low than the Environment agency's? We seen yearly flooding in the Garlick's Arch area! We leave near there.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the Local Plan as the development proposed is not sustainable (Policy S1)
13,860 new houses proposed is not sustainable and with the recent Brexit vote to leave the EU, not in anyway need – it will damage local communities by over development, gridlock traffic especially in Ripley, Send and Clandon.

The local communities don’t need these houses.

Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick’s Arch.

The development should be in urban areas where there is sustainable transport such as Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16734  Respondent: 10956161 / Pauline McCallister  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the Borough Wide Strategy (Policy S2)
GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/1413  Respondent: 10956161 / Pauline McCallister  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to removal of Brownfield site (A34) from the Plan

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to removal of Brownfield sites (A4) from the Plan

Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the increase in housing proposed in Tannery Lane (site A42)

This has been increased by a third since the 2016 version of the Plan. This will have a significant impact on the already highly congested local rural road network around Send. This is in contradiction to section 2.14a of the Plan which states “Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays.” And yet there is no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/1407  Respondent: 10956161 / Pauline McCallister  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the extended development in the Green Belt (Policy P2, Site A43)

I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

1. I object to the allocation of 6 Traveling Showpeople sites in A34 Garlick’s Arch

The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlicks Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.

I object to the potential and ill-defined increase in housing allocation at A43 Garlick’s Arch

The potential of an increase from 400 houses at site A43 Garlick’s Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages.

The inclusion of site A58 Burt Common, removes the need for A43 Garlick’s Arch)

GBC’s own reasons for including Garlick’s Arch A43 in the 2016 version were

1. a)The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm, ... (site allocation A25) [ than the Burnt Common site did ]”

2. b)The site [A43] provides the employment floorspace needed in the plan to help meet identified needs”

Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (which are almost contiguous) are in the plan; therefore GBC are not following their own guidelines and objectives.

Since A58 Burnt Common is now in the Plan (2017) more than the “required” industrial space is available there, so there is no reason for Garlick’s Arch to be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/1409  Respondent: 10956161 / Pauline McCallister  Agent:
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The Plan is self-inconsistent in respect of traveller sites.
A50 Whittles Drive, Normandy, shows on the Site details: “Allocation: The site is allocated for approximately 14 Travelling Showpeople plots ...” Clearly A50 more than covers the total “need” of 8, (page 40, 4.2.22.) and so no “need” exists for this in site A43. This and other inconsistencies in the Plan mean no decision can be made on the basis of this document.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I object to the proposal for a Waste Management Facility in Green Belt (A58)

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/368  Respondent: 10956161 / Pauline McCallister  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the hiding of development by “deferment” (A24, A25, A26, A43)

This version of the Plan has concealed some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects:
i) to hide the number of houses actually being built (A24, A25, A26 – total of 1100 deferred, but still being built!) , and
ii) give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/369  Respondent: 10956161 / Pauline McCallister  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”
So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit is to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/371  Respondent: 10956161 / Pauline McCallister  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of proper infrastructure planning for sites (A43 and A42)

The Foreword to the plan by Paul Spooner includes on page 5:

"We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan”.

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/370  Respondent: 10956161 / Pauline McCallister  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object removing Send Business Park from the Green Belt (4.3.15).

Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4143  Respondent: 10956833 / Aiden Clegg  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to set our my objections to the local plan which seem to me to be based on unsound analysis and which is riddled with errors.

Of particular concern are the assessment of the increase in housing in the borough over the plan period which is too high and appears based on wrong figures. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS. This is not helped by policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

I believe that new housing should be built near existing infrastructure, in particular railway lines, and not be placed in rural areas where reliance on an already overcrowded road network is required.

It is therefore of concern that the quantity of space allocated for retail in the town centre is so high. This could be much better used for residential development. I particularly object to the reliance on the Carter Jonas study update 2017 which includes “demand” for retail space from companies already in administration.

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)
4. Local roads are at capacity particularly when the A3 and M25 is not free-flowing (accidents, diversions, roadworks etc)
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded A3 and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking (even though there are no pavements on the local roads) are being promoted at the same time. This is totally unrealistic and unsafe.
7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.

- The associated traffic increase from the RHS has not been taken into account.
- The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account

1. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
2. I object to the fact that the whole area sits on a hill and the proposed development including high rise buildings will be clearly visible from the Surrey Hills AONB thereby directly going against the "openness" concept of the Green Belt.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5202  Respondent: 10956833 / Aiden Clegg  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to set out my objections to the local plan which seem to me to be based on unsound analysis and which is riddled with errors.

Of particular concern are the assessment of the increase in housing in the borough over the plan period which is too high and appears based on wrong figures. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS. This is not helped by policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

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7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
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   • The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account
1. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
2. I object to the fact that the whole area sits on a hill and the proposed development including high rise buildings will be clearly visible from the Surrey Hills AONB thereby directly going against the "openness" concept of the Green Belt.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5411   Respondent: 10956833 / Aiden Clegg   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
2. It is further from railway stations than any other identified strategic site.
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and walking (even though there are no pavements on the local roads) are being promoted at the same time. This is totally unrealistic and unsafe.

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2. I object to the fact that the whole area sits on a hill and the proposed development including high rise buildings will be clearly visible from the Surrey Hills AONB thereby directly going against the "openness" concept of the Green Belt.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp17q/422  Respondent: 10956833 / Aiden Clegg  Agent:


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I write to set our my objections to the local plan which seem to me to be based on unsound analysis and which is riddled with errors.

Of particular concern are the assessment of the increase in housing in the borough over the plan period which is too high and appears based on wrong figures. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS. This is not helped by policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

I believe that new housing should be built near existing infrastructure, in particular railway lines, and not be placed in rural areas where reliance on an already overcrowded road network is required.

It is therefore of concern that the quantity of space allocated for retail in the town centre is so high. This could be much better used for residential development. I particularly object to the reliance on the Carter Jonas study update 2017 which includes “demand” for retail space from companies already in administration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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The local Plan 2016 appears to have conveniently overlooked the objections raised by the rejection of Application No 15/P/00012 by your own planning committee on 8th April 2016 on the advice of Planning Officers. I urge you not only to think outside the box but outside your borough to the impact on residents in the surrounding area. Thank you for your time and attention.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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My next objection is to the impact on the road network that is already at breaking point. As the building work is planned to continue over a period of years there will be a constant flow of site traffic, the need for the first inhabitants to reach places of employment, education and retail sites adding considerably to the already poor air quality. The resultant traffic congestion adding to existing local residents woes.

As a Cobham resident I fail to see how our village can absorb the increased number of shoppers and their vehicles. And to Cobham people will come as it is unlikely that all necessary infrastructure will be up and running before the first residents move in. This is another cause for objecting to this element of the Local plan 2016. As for the calm assertion that these new residents will take either to their feet or bicycles; plainly these are developers with a well honed sense of humour bordering on the ridiculous.

Next we come to public transport or more sensibly the lack thereof. Even allowing for the longer trains that have been introduced by SWT there is not the capacity to absorb more passenger traffic from the local railway stations nor is there sufficient car parking space and / or provision thereof. Whilst being very grateful for the bus service we do have it is not going to be able to cope with the numbers of passengers at peak times. And even if additional services were introduced it will not make reliability any greater unless there is a dedicated bus lane from Esher via Cobham.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Re: Objections to Guildford Borough Council's draft Local Plan (June 2016) & the inclusion in the Plan Site Allocation A35 the former Wisley Airfield for a new settlement with 2,000 dwellings.

The Green Belt was introduced to prevent urban sprawl and the formation of conurbations both large and small. By removing Wisley Airfield from the Green Belt you are running contrary to those intentions and to this I object in the strongest possible terms. Although not a resident within the Borough of Guildford I contend that living in a nearby location the development will have a far greater impact on those of us living within sound of the M25 than many of those residents in the said borough. Neither have you demonstrated that there are exceptional circumstances to warrant the removal of the area from the Metropolitan Green Belt.

If developers really want to erect dwellings, within the borough, there is an ample supply of brown field sites that they must reclaim and build on. For too long they have been allowed to take the more profitable easy way out by refusing to use these sites in the hope of forcing local authorities to roll over and say of course you must have what you want.

Again I object to the way small local settlements are being selected to be within sight and sound of these proposed expansions. Their rural aspect and charms will be subsumed; their tranquility lost forever. These comments relate variously to Effingham, Ockham, Ripley, Hatchford, Downside and the Horsleys. The greatest damage will be inflicted on Ockham a hamlet of 159 residences. The residents will become part of a development that will have a density greater than many London Boroughs and all this in the Surrey countryside where five storey buildings will dominate the landscape. The impact on those living in Hatchford will be disproportionally high.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **APPENDIX C**

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1189  Respondent: 10957025 / Pauline Masters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trumsp short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

• The “objectively assessed need” figure of 693 homes a year is too high.
• A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
• The current SHMA inflates the proposed housing figure due to
  ◦ failure to correct for errors in the historical data for international migration flows,
  ◦ issues with the way it considers students and affordability and
  ◦ flaws in the method for estimating the number of homes needed to support job growth.
• It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY A25 - Gosden Hill Farm

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).
The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. POLICY A43 AND A43a – Garlick’s Arch

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.
Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/4658</th>
<th>Respondent: 10957025 / Pauline Masters</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D3

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 1480 of 2167
1. **POLICY D4**

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. **POLICY E1**

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.
I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. **POLICY E5**

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/4661  **Respondent:** 10957025 / Pauline Masters  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. **POLICY E6**

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4656  Respondent: 10957025 / Pauline Masters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
### POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>1. POLICY H2</th>
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<tbody>
<tr>
<td>I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.</td>
</tr>
<tr>
<td>In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.</td>
</tr>
<tr>
<td>It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.</td>
</tr>
<tr>
<td>In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.</td>
</tr>
<tr>
<td>And at what point will ‘affordable homes’ be able to go onto the market at full market price?</td>
</tr>
<tr>
<td>As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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| Comment ID: PSLPP16/4660  Respondent: 10957025 / Pauline Masters  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

<table>
<thead>
<tr>
<th>1. POLICY H3</th>
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<tbody>
<tr>
<td>I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.</td>
</tr>
</tbody>
</table>
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses through all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. POLICY I1

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. **POLICY I3**

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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1. **POLICY P2**

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.
The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires
there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>PSLPP16/4662</th>
<th>Respondent:</th>
<th>10957025 / Pauline Masters</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

1. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4640  Respondent: 10957025 / Pauline Masters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan but these are transcended by the result of the recent EU referendum. Expert opinion is certain we are about to enter a period of recession, future local housing needs will differ substantially from those you plan and as a consequence consideration should only be given to the development of existing brown field sites in the Borough. In times of such dramatic political change and economic uncertainty the Green Belt boundaries must not be violated because of an obsolete plan superseded by recent national events.
1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. **POLICY S2**

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.
The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exists, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: SQLP16/833  Respondent: 10957025 / Pauline Masters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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<thead>
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<th>1. Questions posed by Guildford Borough Council as part of its consultation.</th>
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<tr>
<td>Questions from GBC</td>
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<tr>
<td>24.A. Question 1: The evidence base and submission documents</td>
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</table>

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

**ANSWER**

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Answer (if comment is on questions 1-7 of the questionnaire): ()

24.B. Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant? Please provide the following information being as precise as possible:

- why you consider it is or is not legally compliant and
- what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/835  Respondent: 10957025 / Pauline Masters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24.C. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

ANSWER
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick's Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and
foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both
technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic
issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it
overstates housing need. The Council has prevented councilors or others from properly considering the SHMA
by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's
circumstances, including in particular the Green Belt and road infrastructure. National policy permits such
constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on
a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required
infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have
the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the
Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and
Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/836  Respondent: 10957025 / Pauline Masters  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24.D.  Question 4: Duty to cooperate

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to
cooperate? Please provide the following information being as precise as possible:

• why you consider it has or has not complied with the Duty to cooperate and
• what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this
  is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to
cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes
and requirements of the vast majority of the residents in its Borough.
The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/4635</th>
<th>Respondent: 10957025 / Pauline Masters</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

C.i. Policy25 Gosden Hill – My Objections

I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,

The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.

I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247.
through Send and West Clandon - a road which is already under traffic stress (see below). The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4636  Respondent: 10957025 / Pauline Masters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

C.ii. Policy A43 Garlick’s Arch – My Objections

I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches

It ignores all the thousands of previous objections made by local people

There is no proven demand for travelling show people plots in this location

There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.

The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.

This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.
Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4637  Respondent: 10957025 / Pauline Masters  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

C.iii. PolicyA58 Burnt Common – My Objections

I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site

This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.“

There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge allocation of 9.26 hectares at Send in the Green Belt.

The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

The impact on small surrounding roads will create traffic gridlock.

It will join up existing villages and defeat the purpose of the Green Belt.

The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

I object to the potential impact of para 4.4.23a on Burnt Common with its over allocation of industrial zoning is subterfuge for a waste management facility which is a dishonest and underhand approach to planning and proper consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
E. Policy S1 Presumption in favour of Sustainable Development– My Objections
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

G. Duty to Cooperate – My Objections
The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to cooperate with the wishes of its own electorate.
Despite the thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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**Policy D1. – needs strengthening**

Tighten up this policy to make sure that high-quality development is enforced. As the policy stands it will be too easy for developers to ignore.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/15176  **Respondent:** 10957281 / Linda Heffer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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**Policy D4. – needs strengthening**

This policy needs to give greater protection to the Green Belt. Currently it is too weak and will only encourage attempts to further develop the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/15165  **Respondent:** 10957281 / Linda Heffer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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Guildford Borough principally needs: affordable houses, and homes for older people. Student accommodation should be provided by Guildford University itself: it already has the Manor Farm site allocated for that purpose. The Borough does not need more large mansions for wealthy migrants to the area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
**Comment ID:** PSLPP16/15168  **Respondent:** 10957281 / Linda Heffer  **Agent:**  

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Answer (if comment is on questions 1-7 of the questionnaire): ()  

Policy H2. – I object  
Affordable housing should comprise about 80-90% of any new developments.  

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**  

Attached documents:  

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**Comment ID:** PSLPP16/15172  **Respondent:** 10957281 / Linda Heffer  **Agent:**  

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Answer (if comment is on questions 1-7 of the questionnaire): ()  

Policy P2. – I object.  
The requirements under this policy are a consequence of the flawed Strategic Housing Market Assessment which over-estimates future migration trends, on top of which arbitrary, unsubstantiated factors are applied. There is no popular desire to see large-scale inward migration as envisaged in the Draft Local Plan, which will inflict extra, large pressure on local infrastructure and degrade the quality of life for the population. The proposal to remove West Horsley and other rural villages from the Green Belt is not consistent with the NPPF in that it does not reflect in fact ‘the great importance’ that the Government attaches to Green Belts. There is no proven need for these removals. The Strategic Housing Market Assessment is flawed in over-estimating the amount of inward migration that will occur; in this regard it is inconsistent with latest estimates from the Office of National Statistics, and with projections of national immigration made by Government (‘down to tens of thousands rather than hundreds of thousands’), and now more likely to be achieved following ‘Brexit’.  

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**  

Attached documents:  

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**Comment ID:** PSLPP16/15163  **Respondent:** 10957281 / Linda Heffer  **Agent:**  

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

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This policy has totally ignored the following key requirements from paragraph 17 of the NPPF:

- “take account of the different roles and character of different areas, promoting the vitality of our urban areas, protecting the Green Belts around them”
- “recognising the intrinsic character and beauty of the countryside and supporting thriving communities within it”
- “contribute to conserving and enhancing the natural environment and reducing pollution”
- “encourage the effective use of land by reusing land that has been previously developed (brownfield land) provided it is not of high environmental value”
- “conserve heritage assets in a manner appropriate to their significance”
- “actively manage patterns of growth to make the fullest possible use of public transport walking and cycling and focus significant development on locations which can be made sustainable”.
- “empowering local people to shape their surroundings”

Removing West Horsley and other rural villages from the Green Belt by ‘insetting’ them, and expanding the boundaries of the settlement areas into neighbouring green fields (i.e. reducing the Green Belt) does NOT protect the Green Belt. Nor does it give adequate recognition to the intrinsic character and beauty of the countryside. Nor, by giving developers the option of building more cheaply on green fields does it encourage the effective use of land by reusing land that has been previously developed (brownfield land). By turning West Horsley into a rural town, it does not conserve the heritage assets of West Horsley. By encouraging 35% more houses in a rural village without intrinsic employment, rather than brownfield urban sites, it does not make fullest possible use of public transport, walking and cycling within the Borough. It is obvious from the degree of protest that there has been throughout Guildford Borough to the previous (2014) Draft Local Plan and the preceding ‘Issues and Options’ ‘consultation’ that local people wish to shape their surroundings in ways that are entirely different from that which is projected by the Draft Local Plan. The inconsistency between the draft Local Plan and the wishes of the local population is specifically the case for West Horsley Parish.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objection response: Policy A35: Land at former Wisley Airfield, Ockham

Proposed location: development of a new settlement

(including approx 2000 dwellings, 100 sheltered accommodation units, 8 traveller pitches, approx 4,300 sq m of employment space, approx 1,100 sq m of retail space, a local centre, primary school and secondary school)

- Proposed site is green belt. All green belt land must be protected. Guildford Borough council must vigorously defend all green belt land. The national planning policy framework 2012 (section 9.79) states that: "The Government attaches great importance to Green Belts. the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of green Belts are their openness and their permanence'.

- Developed near site of special scientific interest (SSSI) and the thames basin heaths special protection area (spa).

- Potential for increased crime and nuisance (nearest police stations were Ripley and Cobham but both are now closed).

- More light pollution.

- More air and noise pollution.

- Adverse visual impact. No amount of 'landscaping' will remove the impact that 2000 houses, shops, schools, retail outlets, offices, additional cars, lorries and vans will have on the surrounding area.

- More litter on our road sides. Parts of the A3 and many of our local roads are lined with litter which is very unsightly and whichever 'body' is responsible for clearing litter do not seem able to do so or have a solution to the problem. Imagine what extra litter a whole new settlement could bring.

- Drainage Inadequacies. Although the site itself will have new drainage systems on site, presumably there will need to be connected at some point onto existing local systems. Ditches on local lanes are very rarely cleared these days which can contribute to road flooding as the rain cannot always disperse into the ditches and the existing drain system cannot cope. The new drainage required for this site will just add to this problem.

Objection response.

Policy A35: Land at Former Wisley Airfield, Ockham

Proposed allocation: development of a new settlement

- Pedestrian and cycle network not adequate. Many local roads/Lanes around the site do not have pavements. Many of them are very narrow and dangerous for cyclists. They are not suitable for any increase in traffic, especially vans and Lorries visiting the settlement and new cars which appear to be increasing in width. If the council really want to try and encourage more people to cycle, it will not be by painting 'dotted lines' on the road. Cycle lanes in and around rural areas and villages need to be separated somehow form the roads (possibly by using curb edging to divide the cycle lane from the road) but unfortunately many of the Lanes around the site are not wide enough to do this. However, creating specific cycle lanes away from roads may not be a good idea as they could, even with lighting, become isolated areas and therefore not a safe environment.

- Rail commuters may prefer to drive (or be driven) to a railway station causing more congestion. Car parks at nearest station(s) may not be large enough to cope with the increase and are chargeable, increasing the cost of the commute.

- Bus services. Policy A35 states that a significant bus network will be set up to be provided and secured in perpetuity. It would need to be a significant frequent bus network covering, peak times, say, 07:00-10:00 HRS and 16:00-19:30 HRS. It must also have a timetable up to approx 23:45 HRS, linking with train arrivals at the various railway stations, including Woking and Guildford, to cover those returning at various times from a city night out. Is the developer, who is funding the delivery of this network, also going to fund the ongoing running costs of this significant (and hopefully frequent) bus network in the many years after completion - if not then who is?
- Access Roads to/from the site

A3 Ockham interchange. This roundabout is already very busy at peak times. Queues onto the A3 Northbound at this junction are normal, especially as the inside lane of the A3 at this point is usually queued down to junction 10 of the M25. On many occasions the middle lane is also queued. If anyone using this roundabout wanted to go south onto the A3, they would need to go through Ripley and Burnt Common which is already crowded at peak times. The slip road from the A3 (towards Horsley, Ripley, Send, Woking areas) is already very busy and the junction and adjoining roads cannot cope with more vehicles. For all the above reasons, having additional traffic at this interchange is not viable.

Old Lane. Drivers wishing to head south on the A3 from this lane would turn left onto the slip road connecting J10 of the M25 to the Southbound A3. This slip road is currently extremely busy with cars in the process of speeding up to join the fast movement of cars already on the A3. To potentially have a great number of new cars trying to get onto the slip road at his point would not be a good idea.

- Proposed mitigation measures in Ripley: If Ripley high street and Newark lane need improvements and there is a suitable way of improving the already congested crossroad in Ripley, then those changes should be done anyway. I appreciate approving this development is a way of getting someone else to pay for the work but this is too high a price!

- Surrounding Road Network: Traffic along the A3 is at a standstill most weekdays between Burpham and the A31 Hogsback Junction.

- The A246 is already a busy road during peak hours and any increase in traffic, either towards Leatherhead or Merrow and Guildford, would just make it worse.

- There are queues at peak times on the A247 at the Old Woking roundabout, the Burnt Common Roundabout, the B2215 through Ripley and Painshill roundabout junction.

- Further afield at peak times there are queues at the A3 Copsem lane junction and Copsem lane itself towards Oxshott and towards Esher. Queues through Esher from both Cobham and Kingston directions. The A245 from Brooklands to West Byfleet. The A245 Byfleet road to the Painshill Junction with the A3. The A318 from Brooklands. The A31 Hogsback junction onto the A331. The A31 Farnham by-pass. The A24 Leatherhead Road towards the Leatherhead by-pass roundabout. These are just some of the problem roads in the surrounding area.

- If major incidents occur in this area on the M25 or A3, the Local Roads become even more congested than normal.

- Conclusion- Green Belt Land/Access/ Surrounding road Network.

All Green Belt Land must be protected.

Taking into account all the points raised, it is quite clear that the access links for this site are not viable and the surrounding road infrastructure is nowhere near ready for this development.

- All these road network issues need to be addressed, filed and dealt with before and further development, especially one of this size, is even considered otherwise no one will want to come to Guildford or its surrounding villages and no company will want an office or unit in the area where their employees, visitors or delivery Lorries/vans have to sit and waste time and money on grid locked roads in order to get there.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>Policy A42: Clockbarn Nursery, Tannery Lane, Send</th>
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</thead>
<tbody>
<tr>
<td>Proposed Allocation: 45 Houses</td>
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<tr>
<td>Response: Objection</td>
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</tbody>
</table>

- Proposed site is Green Belt. All Green Belt Land must be protected.
- Adverse affect on quality of life for existing local residents and the character of the locality.
- Local infrastructure is totally inadequate.
- Link road network not adequate: There are queues at Peak times on the A247 at the Old Woking roundabout, the Burnt Common roundabout, the B2215 through Ripley and getting on or off at some local A3 Junctions, especially leading to the M25 Junction 10.
- Tannery Lane itself is very narrow and in parts single track. Papercourt lane and Polesdon lane leading on from Tannery Lane are also very narrow/single track. Cyclists and, with great care, walkers (sometimes backing into busses to let cars go past) use these lanes as there is access to the river Wey lowpath. These lanes are not suitable for increased vehicular activity.
- The junction with Send road (A247) is hazardous. There was a previous suggestion of putting traffic lights at the junction of Tannery Lane with Send Road. If this proposal still exists, it is not viable. There are already traffic lights just as a short distance away at the main crossroads with Send Marsh Road, Send Hill and Send Barns Lane. A second set of lights would cause even more congestion than at present.
- Adverse impact on the natural environment, including visual.
- Site near special protection area.
- More pollution- light, noise, air
- Tannery Lane not served by public transport. Last bus back to Send from Woking mainline railway station id 19:30HRS which is far too early. No buses through Send road/Send Marsh road on a Sunday.
- Potential for increased crime and nuisance (nearest Police station was in Ripley but has now been closed).
- Community issue: the medical centre in Send Barns Lane is shared with Send Marsh, Burnt Common and Ripley and is consequently very busy. There can often be a wait of up to 7-10 days for a standard appointment. No public transport operates along Send Barns Lane to the medical centre.

Surrounding Road Network:
- The traffic along the A3 is at a standstill most weekdays between Burpham and the A31 Hogsback Junction.
- If there are any major incidents on the M25 or A3, the local roads are even more congested than normal.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- Proposed site is Green Belt. All Green Belt land must be protected.
- Significant adverse effect on quality of life for existing local residents and the character of the locality.
- Local Infrastructure is totally inadequate.
- Access road network not adequate: the traffic along the A3 is at a standstill at some point most weekdays (and some weekends) between Burpham and the A31 Hog’s Back junction and northbound at peak times towards the M25 at junction 10. If there is a problem on the A3 northbound towards the M25, Motorists try to beat part of the traffic jam by taking advantage of the B2215 London Road slip road to continue via Burnt Common and Ripley and filter back onto the A3 near Wisley. Obviously this causes even more Queues on Local Roads. If there are any major incidents on the M25, again local roads become more congested than normal.
- Local Link Road Networks would not cope with the added number of cars, let alone cans and lorries. There are already queues at peak times on the A247 at the old Woking roundabout the Burnt Common Roundabout and the B2215 into Ripley
- Much more pollution for the area – noise, light, air.
- Site covered by ancient woodland.
- Potential for increased crime and nuisance (Nearest Police station was in Ripley but has now been closed)
- Community Issue Re Housing: Medical Centre in Send Barns Lane (Shared with Send, Send Marsh, Burnt Common and Ripley) – Difficulty Getting Appointment Now and no public transport operates along send barns lane to the centre.
- There are no busses towards Woking on a Sunday at present and bus times (Mon-Fir) would need to increase at peak times and later in the evenings back from Woking railway station (Last bus back to Send/Ripley is currently 19:30 hrs)
- The cycling network is not adequate or safe. It will be even worse if more cars, van and Lorries come into the area. If the council really mean to encourage more cyclists then the cycle lanes need to be separate from the roads. Putting dotted lines on the roads is no good and not safe.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy 43a: Land at Send Marsh/ Burnt Common

Proposed allocation: New A3 on/off slip roads

response: objection

Objection response: Policy A43a: Land for new A3 on/off Slip roads, Send March/Burnt Common

I object to the proposed new on/off slip roads at Send Marsh/ burnt common.

Traffic through the village of Send is already very busy, particularly at peak times, with queues up to The Burnt Common roundabout at Old Woking. If this proposal was approved, Send would become the main through route for all traffic on to an off the M24 and A3 heading to and from the Woking area. This would have a significant detrimental affect on Send villages environment.

The A247 towards Clandon is very narrow in places and again unsuitable for increased traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3268  Respondent: 10957313 / R Holmes  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The development of any housing and/or traveller pitches would in no way be compatible with the appearance of the surrounding area and would have a significant adverse impact on the quality of the environment and character of the locality including water supply, waste management sewerage, pollution (Light, Noise, Air), safety, crime, traffic, visual, nuisance to neighbours on site. It would also have an adverse effect on the peaceful quality of life for existing send hill residents. Send Hill and the two surrounding roads still keep to the unwritten rule or no noise outside on a Sunday morning before 10 o’clock and we would not want that disturbed. The proposed site is on Green Belt Land and should not be allowed.

Traffic – Send hill is apart from school drop off/pick up times, a quiet road which narrows into single track road near to the proposed site and beyond to the junction with potters lane and is totally unsuited to an increase in traffic. Residents Feel at ease walking in send hill at present, even though there are no pavements. The increase in vehicular traffic that this proposed development would bring would seriously affect the safety of existing residents, all pedestrians and all cyclists. Indeed send hill is featured in one of the surrey county council’s cycle guides, which we would not want to compromise and has six footpaths leading off in various directions for walkers. The main roads leading to send hill are already overcrowded with queues down to the old Woking mini roundabout and up to the shell garage roundabout at peak times.

Parking Issues – Send hill has enough off-street parking for residents which means there are usually no cars parked in the road – a rare sight for most roads these days! Whilst appreciating that Guildford borough council would I’m sure like to see a reduction in the number of cars, It is unfortunately the case that most households of 2 adults would probably have 2 cars. This being the case, each dwelling built would need 2x off street car spaces for the residents plus at least 1 space off-street car space(s) for visitors, otherwise parking problems will undoubtedly occur. The potential cumulative Impact of any on-
street parking would have an extremely detrimental effect on the lives of send hill residents living close to the entrance of the new development and the character of the locality as a whole.

**Visual** – Many residents would have their visual aspect of the countryside completely destroyed and no amount of landscaping would make it attractive or compensate for the views lost.

**Light Pollution** – Street furniture is at a minimum but would increase and light especially would be affected. Send Hill only has one street light (approximately halfway down). The proposed development would have new lighting on site plus all the internal and external home lights which would be intrusive to existing residents overlooking the site. The increase in traffic would mean send hill would require more street lighting (and other signs) for safety reasons which would affect the whole character and appearance of the road. Some existing residents would also feel obliged, whether they wanted to or not, to add more external lights to their homes in order to feel more secure.

**Crime** – I'm sure that Guildford Borough Council considers crime prevention a very important issue. Residents feel that the opportunities for crime and nuisance would increase with any development on Send Hill and it would not seem logical to try to improve the wellbeing of one selection of the community at the expense of the wellbeing of the existing section of the community.

**Utility Infrastructure** – All utilities would need to be extended/updated. Water pressure in send hill can at times be very low. Land drainage in the area is a problem – Most drainage ditches are overgrown, part of the sewerage pipes In send road collapsed some years ago and would surely need updating If any new developments were going to be allowed. The rubbish thrown on the roadsides has increased and the council do not appear to have any scheme to deal with this ongoing unsightly issue. How then will they cope with all the additional waste management issues which will arise from a new development? Major disruption to send hill and the surrounding area would need to take place in order to achieve a proper utility infrastructure and no satisfactory access could possibly be provided by the local road network.

**Natural Environment** – The land suggested is on green belt land and the long term protection from this type of inappropriate development must surely be a top priority open space is important for its visual impact and its contribution to the quality of life. Send Hill’s fields hedgerows and trees may not be of national importance but are, for us, locally important features that provide refuge and wildlife corridors for many species of insects, birds and animals and any development would have a damaging effect on all of these, the fields and footpaths surrounding send hill also provide leisure relaxation which most definitely would be compromised.

**Community** – Some Facilities are already overcrowded or have been closed the medical centre in send for example is shared with Ripley and appointments can be in excess of 10 days the last local police station in Ripley has now closed leaving the nearest police stations in Guildford and Woking covering much larger areas which may mean longer response times the cemetery which lies along the single track part of send hill, has recently been extended. It is a very peaceful place for relatives to visit the local community would not want this tranquillity disturbed.

**Hazardous Material** – The site proposed is on an old landfill site and Guildford borough council have suggested in the past that the site is now free from methane gases produced by normal landfill items. However no one at Guildford Borough Council can categorically confirm or deny that any asbestos or any other hazardous material was not dumped on the site unless Guildford borough council can give an absolute assurance, In writing to residents, then it would be irresponsible to use the site for any development as there could be an unacceptable health risk if disturbed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:  
[capture8.JPG](capture8.JPG) (106 KB)
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am objecting in the strongest possible terms to the proposed removal of green belt status from any part of the Send Ward (Send, Send Marsh, Burnt Common).

In Guildford Borough Council’s proposed submission Local Plan – June 2016 strategy and sites forward by Cllr Paul Spooner – Leader of the council he states ‘The Borough of Guildford is a very special beautiful place for all who live and work here. We want to keep it this way for generations to come. We want to keep it this way for generations to come.

- If this is so I cannot begin to understand why Guildford Borough Council is contemplating ruining the environment it is supposed to protect.
- The Removal of any areas of Send, Send Marsh and Burnt Common from the Green Belt Should be vigorously opposed so as not to radically change or damage our village environments.

In the ministerial forward of the national planning policy framework 2012 it states: ‘our national environment is essential to our wellbeing………To the benefits of body and soul’ and ‘Planning must be a creative exercise in finding ways to enhance and improve the places in which we live our lives’

- Removing green belt status would certainly not enhance or improve our well-being or the places in which we live.

The national Planning Policy Framework 2012 (Section 9.79) States that: ‘The government attaches great importance to green belts. The fundamental aim of Green Belt Policy is to prevent urban sprawl by keeping land permanently open; The essential characteristics of Green Belts are their openness and their permanence’

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2751  Respondent: 10957313 / R Holmes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This amended policy has increased the number of homes from approximately 45 homes (C3) to approximately 60 homes (C3) and therefore all my objections from the original response still remain.

I mentioned in my original response that for anyone using public transport, the last bus back to Send from Woking mainline railway station was 1930hrs which was far too early and no bus service runs through Send Road/Send Marsh Road on a Sunday. Since writing that response, the last bus back to Send from Woking mainline railway station has been cut to 1820hrs!! also, from Guildford, the last bus that goes through Send has been cut and now leaves Guildford at 1825hrs.
For existing Send commuters/daytrippers the public transport to/from rail stations was not good enough and mean they have to use their cars. These cuts make is even more abysmal. This policy (A42) would mean an increase in cars on the roads as people from any new development in Send would also need to use their cars.

One of the changes that the council has made in its ‘Local Plan 2017 – Policy ID3: sustainable transport for new developments’ is:-

(2)(d) The provision and improvement of public and community transport.

Send has had their public transport bus timetable cut and I couldn’t find under the ‘Local Plan 2017 – Infrastructure Schedule – BT Bus Transport’ any mention of bus improvements for Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2750  Respondent: 10957313 / R Holmes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

With regard to public transport, I mentioned that he last bus back from Woking mainline railway station was at 1930hrs. This service has been cut and now the last bus back from Woking that goes past Send Marsh Green and then Burnt Common is at 1820hrs. this time is unacceptable for any commuters/daytrippers and will mean an increase in the number of cars using the already congested roads.

I not only object to the 400 homes but also to the additional proposal of 6 travelling showpeople plots for the same reasons as set out in my original objection response dated 15 July 2016.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2747  Respondent: 10957313 / R Holmes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
An additional ‘requirement’ Guildford Council has made is there would be need to be improved visibility at the junction of Send Hill with Potters Lane.

Whilst improved visibility at any road junction is a good thing, this junction is a staggered crossroads with a blind bend to the right when exiting Send Hill so would still need to be used with extreme care, especially as cyclists and walkers use these lanes as well. Send Hill itself is single track in parts and also has a blind bend leading down to this junction. Send Hill is totally unsuitable for any increase in traffic which, if this policy is allowed, is inevitable and therefore this policy (A44) should be removed from this and any future local plan.

An additional ‘key consideration’ Guildford Council has added to their submission is ‘contamination’. The council has now fully acknowledged that the site may be contaminated. As such this site should not be considered for any type of development or pitches/plots now or in the future. This policy (A44) should be removed from the proposed local plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/2749  **Respondent:** 10957313 / R Holmes  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Should this proposed use be allocated: No

- Proposed site is green belt. All green belt land must be protected.
- Significant adverse affect on quality of life for existing local residents and the character of the locality.
- Local infrastructure is totally inadequate.
- Access road network not adequate: the traffic along the A3 is at a standstill at some point weekdays between Burpham and the A31 Hogsback Junction and northbound towards the M25 at Junction 10. If there is a problem on the A3 northbound towards the M25, motorists try to beat part of the traffic jam by taking advantage of the B2215 London Road slip road to continue via Burnt Common and Ripley and Filter back onto the A3 near Wisley. Obviously this causes even more queues on the M25, again the local roads become more congested than normal.
- Local link road network would not cope with the added number of cars, let alone vans and lorries. There are queues at peak times on the A247 at the old Woking Roundabout, the Burnt Common Roundabout and the B2215 through Ripley.
- The new sliproads, which have been proposed in the Local Plan – 2017, to/from the A3 at Send Marsh/Burnt Common may alleviate some of the traffic going through Ripley to/from the A4 but it will not solve Send’s traffic problems. Creating new slip roads here will just have the effect of pushing more traffic through Send, Send Marsh and Burnt Common.
- Foot of A3 slip road to London Road still prone to flooding.
- Vehicles exiting Woodhill at the London Road junction have to be extremely careful as they must contend with vehicles travelling fast off the A3. They have limited views as the A3 is at a slightly higher level than Woodhill so cars can only be seen once they are on the short slope of the slip road.
- Much more pollution for the area – noise, light, air.
- Site near special protection area.
- Public transport links for employees are not good if coming to/from the Woking direction. The only bus service is the 426/463 via Send and Send Marsh. There are no arrivals at Burnt Common between 0756hrs and 0925hrs.
(The 0925hrs service also deviates down to Ripley before turning round to go back up to Burnt Common – which would cost more). On the return journey back towards Woking, there are no departures from Burnt Common between 1537hrs and 1742hrs (the 1742hrs also does the loop down to Ripley before coming back up to go back to Woking through Send). This bus service does not run Sundays or Public Holidays. Under the ‘Local Plan 2017 – infrastructure – BT Bus Transport’ there doesn’t appear to be any proposed improvements listen for this bus route.

- The cycling network is not adequate. It will be even worse if more cars, vans and lorries come into the area. If the council really mean to encourage more cyclists, then cycle lanes need to be provided each side of the road and be separated from the roads (perhaps by way of kerb edging). Putting dotted lines on the roads does not work. It does not encourage new users and is not safe.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1250  Respondent: 10957313 / R Holmes  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In respect of the 2x traveller pitches, I believe this site is not of sufficient scale to trigger the policy threshold for providing traveller accommodation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1251  Respondent: 10957313 / R Holmes  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In the ‘Proposed Submission Local Plan – June 2017’, Guildford Borough Council has added Send Business Park to the list of sites they want removed from the green belt.

I write to object to the removal of Send Business Park from the green belt.

All green belt land must be protected – even previously developed sites. If we allow this, we will never get it back again and it will become easier for councils/developers to put developments on other green belt land. My previous objections also therefore apply to this objection response as well.
I would like to register my objection to the inclusion of Garlick's Arch development in new local plan.

Gbc have not only failed to follow correct process but this policy A43 was introduced in cynical, dishonest manner without due consultation. The site is green belt covered in ancient and precious woodland with trees and wildlife we have a duty to safeguard.

The industrial development is not required at this site - if indeed it is at all required, which is questionable, then Slyfield is the obvious choice.

The roads between Ripley, Send and Guildford are already gridlocked in rush hour. To increase traffic by allowing this proposal is detrimental to health and welfare of community; dangerous for area with high numbers of children - and grossly negligent to what is permanently protected green belt land.

I strongly object to the Policy A43 at Garlick's Arch and urge you to reject this proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I would like to register my objection to the inclusion of Garlick's Arch development in new local plan.

Gbc have not only failed to follow correct process but this policy A43 was introduced in cynical, dishonest manner without due consultation. The site is green belt covered in ancient and precious woodland with trees and wildlife we have a duty to safeguard.

The industrial development is not required at this site - if indeed it is at all required, which is questionable, then Slyfield is the obvious choice.

The roads between Ripley, Send and Guildford are already gridlocked in rush hour. To increase traffic by allowing this proposal is detrimental to health and welfare of community; dangerous for area with high numbers of children - and grossly negligent to what is permanently protected green belt land.

I strongly object to the Policy A43 at Garlick's Arch and urge you to reject this proposal. I object to taking away Send's GREENBELT status. I object to proposal for new A3 interchange at Burnt Common. There is too much pollution and congestion with existing houses and traffic. I would like my objection to be shown to planning Inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to A43 policy at Garlick's Arch.

this is GREENBELT land and is permanently protected by NPPF to prevent merging of settlements.

This site is new and was not consulted upon previously. GBC have not followed correct process re consultation. They have acted in dishonest, underhand manner and one has to wonder what personal benefits some councillors are incentivised by?

there is no evidence that housing and employment space needed at this site.

if it is required at all in the borough - which it isn't - then Slyfield would be more appropriate site - land surrounding Garlick's Arch and Burnt Common is precious GREENBELT land. There are ancient trees and an abundance of precious wildlife.

A new 4 way interchange onto A3 would be disastrous for Send, Ripley and Guildford. The traffic congestion is already problematic and congested and dangerous in peak travel times. Send and Ripley would become more of a through route than they can already cope with. Living off Burnt Common Lane it can already take too long to get onto Portsmouth Road and this area has a lot of families with young children and a large amount of elderly people. Do GBC and the Planning Department want a tragic accident to occur in order for them to see sense and realise this proposal (A43) could result in loss of life and/or serious injury?

Infrastructure overload is ignored in this proposal and GBC are ignoring the many brownfield sites available - please DO NOT DESTROY WHAT IS LEFT OF OUR GREENBELT,

i hope the planning department will rise above the foolishness of some council members backing this plan and make the logical and wise decision to say NO to policy A43.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I object

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/86  Respondent: 10957441 / Christopher Hunter  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/90  Respondent: 10957441 / Christopher Hunter  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I object

not sound at all!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/83  Respondent: 10957441 / Christopher Hunter  Agent: 

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<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate</th>
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<td>I object to A43 proposal at Garlick's Arch</td>
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| Comment ID: SQLP16/92  Respondent: 10957441 / Christopher Hunter  Agent: |
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I object to proposal A43 Garlick's Arch

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SLP16/84  Respondent: 10957441 / Christopher Hunter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SLP16/93  Respondent: 10957441 / Christopher Hunter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I object to Policy A43 Garlick's Arch

There is no need for any more houses or warehousing in this area.

This site was not included in regulation 18 draft and has not been consulted upon previously.

It is GREENBELT permanently protected by NPPF which prevents the merging of settlements.
The site has a particular conservation sensitivity as it is covered in ancient woodland with a wildlife population that needs protecting.

If there is a need for more industrial space then Slyfield is the intelligent and obvious choice.

A new interchange onto A3 from this site would be a disaster for the community, for the safety of young and old, for nature, for congestion and would show a complete disregard for this wonderful slice of GREENBELT land remaining.

I object!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/1565  Respondent: 10957441 / Christopher Hunter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A42 Tannery Lane. The roads cannot cope with this increase in houses and the many precious objections have again been ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/1564  Respondent: 10957441 / Christopher Hunter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy A43 at Garlick's Arch because it ignores the huge amount of previous objections made by local people such as myself.

There is no proven demand for Travelling Showpeople plots in this location and the over development of our village and the number of homes proposed is totally excessive.

The impact on our roads is very worrying and dangerous as lots of local children walk and cycle to school and the roads cannot cope with any more traffic and congestion.

The negative impact on destroying the Green Belt is obvious and this must be protected at all costs. Frequent flooding would be much worse and natural habitats for animals and insects destroyed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: pslp172/1563</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
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As a resident of Burnt Common for twelve years, I would like to strongly object to the above proposals.

I object to Policy A58 at Burnt Common because it was deleted from the 2014 draft because of all the objections previously made. There has been a decline in demand for industrial land and it is totally wrong to build industrial or warehouse development in the middle of this precious Green Belt. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPS16/443</th>
<th>Respondent: 10957537 / Jonathan Holland</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.
I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2230 Respondent: 10957857 / Adam Aaronson Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT in particular to including Sites A36-41 (East and West Horsley). The Horsleys feel victimised by this plan, which seems to have been masterminded by Council leaders representing Ash and Tongham at the other end of the borough, where (in a flagrant case of political double standards) the Green Belt is actually being extended under Policy P3.[3]

Whatever their merits as development sites, the 6 Horsley sites should not be considered individually but for their cumulative impact on the contiguous villages of East and West Horsley. It is crazy to consider them independently and the must be considered as a whole.

I consider that building 533 new houses on these 6 sites, plus at least another 90 on small sites is (a) excessive in absolute terms and (b) disproportionate relative to the rest of the borough. It will destroy the rural character of these communities.[4]

Under the plan, rural West Horsley will take 35% of new homes, urban Ash and Tongham 16% and Guildford urban area only 11%. The total number of homes in West Horsley will increase by 35%, which is disproportionate when measured against the overall increase in housing across the borough and particularly in Guildford town. If the Council have justifiable reasons to transform a particular community so radically, the plan should present a case rather than putting forward site proposals as a fait accompli. Basically the plan is dumping a disproportionate quota of the borough’s housing need on the Horsleys.

These sites will put unsustainable strain on local facilities and infrastructure, including public transport, parking, schooling, medical facilities, sewage, surface drainage and shops. For instance:

- Thames Water have advised the Council that the current wastewater network will not cope and that the foul drainage system all the way to the treatment works North of Ripley will need to be upgraded.
Guildford Council’s Education Review says “expansion options may need to be considered for primary” education in the Horsley area within the first 5 years of the plan, but Surrey County Council have no plans to do so. The Raleigh School is already full. The private Glenesk and Cranmore schools are also at or near to full capacity. The suggestion that schools in Ripley can be used contradicts the plan’s stated intention to reduce traffic on the A3 and strategic aim that primary schools should be within walking distance.

The plan’s Infrastructure Schedule (Appendix C) imagines an “East Horsley and West Horsley traffic management and environmental improvement scheme between 2019 and 2023 by Surrey CC” but gives no details. This scheme is just wishful thinking - another fairy tale. The proposed housing can only harm the local environment, not “improve” it.

The harmful impact of these sites is magnified by the proximity of the so-called Wisley Airfield site (Three Farms Meadow), with over 2,000 new homes only 2 miles away (see below).

The density of new housing on the 6 Horsley sites is inappropriate, being greater than anywhere in the locality at present.

Sites situated on the periphery of existing development in the Horsleys encroach on surrounding open fields and require the extension of settlement boundaries for which the plan presents no arguments. Contrary to NPPF paragraph 79, this will contribute to creeping urbanisation by attenuating the Green Belt corridors separating the Horsleys from neighbouring settlements.

Collectively, these 6 sites militate against NPPF paragraph 81’s encouragement of access to the Green Belt and its amenity and recreation value. This has been a success story in the Horsleys, with the creation of an amenity wood and community garden, the purchase of adjacent fields (on the eastern side of Ockham Road North) by local residents in order to preserve their open aspect, well-maintained pitches for local football and cricket clubs, public tennis courts, open space for a high-quality campsite (at Waterloo Farm) used by many foreign tourists and the approval of plans for a “Theatre in the Woods” – making West Horsley the only village in Surrey with an opera house. The open nature of West Horsley determined that a long portion of the 2012 Olympic cycle races passed through the village. This route has since been adopted by cyclists as a permanent asset, including the annual Prudential cycle race. These and future examples of “positive planning” depend on protecting the Green Belt to maintain the openness and attractiveness of the local landscape and avoiding the urbanisation and traffic congestion that Sites A36-41 will bring.

By surrounding Waterloo Farm campsite with 120 new houses, Policy A40 on land to the North of West Horsley will make this rural tourism amenity unviable.

Site A40 is subject to an unacceptable flood risk from a combination of a high groundwater table and the lack of surface water run-off. This is flat, clay land on the downhill side of the Horsleys where floodwater from new development will accumulate and back up onto existing properties nearby. I can provide photographs proving how badly these fields already flood at present. These problems will only get worse with the increase in extreme weather events associated with climate change. The “appropriate mitigation” suggested in Policy A40 exists only as an abstract notion. It should not overrule the need for Green Belt “exceptional circumstances”.

Policy A40 underestimates the problems of safe access and egress. Firstly, Ockham Road North was closed for several weeks in 2014 because of flooding, and still floods regularly. Secondly, access problems are not confined to flooding and are not addressed by the proposal to extend the existing 30mph zone past the site entrance. Repeated attempts made by Ockham Road North residents to extend this zone have been turned down by the local authorities, Highways England and Surrey Police, even though data collected in 2015 show that traffic has doubled over the last 15 years and that the average speed in the 40mph section of this road is 52mph, with maximum recorded speeds of over 80mph. No traffic calming measures have so far been achieved. Additional housing will add to several hazards along this stretch of road, including:

- Its use by pedestrians, especially children (using the Raleigh and Glenesk schools and catching school buses to Guildford and Howard of Effingham), pensioners living in the string of bungalows at the northern end of the road, and visitors from the Waterloo campsite who are unfamiliar with the area.

- The existence of a narrow footpath on only one side of the road in any one spot. The layout means that walking half a mile between Green Land and East Lane requires crossing the road twice.
• The road’s increasing use by recreational cyclists (see above).

• Its winding nature, poor sight lines (especially when interrupted by summer vegetation) and dangerous, concealed driveways. Most of these were built in the 1930s. Some have been widened but many are too narrow for modern traffic. Since a deep ditch runs along most of the road, vehicles have to swing out dangerously when entering or leaving.

• The prospect of additional traffic, including 19,000 HGV movements (90 a day over a long period) if Surrey County Council approves the Drift Golf Course’s planning application to re-landscape its site using bulk waste transported from London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4999  Respondent: 10957857 / Adam Aaronson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Three Farms Meadow site

I strenuously object to the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision – a clear indication to the developers to try again, with minor adjustments. This is unacceptable.

This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected. I am concerned that there is no transparency as to the identity of the developers who are hiding behind a Cayman Islands company. This type of anonymity has recently been discredited by the government, but it does not seem to bother GBC, Policy A35 should be removed from the plan for all the reasons by which the development was rejected by the Planning Committee, including:

• Green Belt location and absence of “exceptional circumstances”.
• Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.
• Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).
• Proximity to A3/M25 bottleneck and Ripley village and roundabouts.
• Absence of adequate traffic data.
• Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.
• Loss of high-quality agricultural land (55% of the site), in breach of national policy.
• Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.
• Presence of a Surrey County Council safeguarded waste site.
• Cost of infrastructure required to the detriment of alternative more favourable sites.
• Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.
• Impact on listed buildings.
• Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.
• Extreme housing density with tiny garden spaces.
• Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.
• Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).
• Failure to evaluate the cumulative impact of this and nearby development sites on the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10702  Respondent: 10957857 / Adam Aaronson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H1 – Homes for all

I object to the proposed housing mix, based on the assumptions set out in the Strategic Housing Market Assessment (SHMA). The SHMA has not been scrutinised or evaluated and seems to be a figure dreamt up by an expensive firm of consultants who are not prepared to release their underlying figures on the spurious grounds of data protection and it seems that councillors are gullible enough to accept these figures without scrutiny. One councillor stated that there was no point in employing a dog and then barking oneself. Another said that of course the figures were wrong, but not sufficiently wrong to matter! Until the underlying data is released there is no basis for accepting these figures. They are just a fairy tale.

I am in favour of high density development in the urban area. I recognise the need for student accommodation and agree that this should be provided for 100% of new students and more than 60% of existing students. This would free up suitable family accommodation in the urban area.

So far as I am aware Guildford borough already has an excellent track record in providing traveller sites. Indeed this is proportionately higher than most comparable boroughs. When evaluating the need for additional traveller site, this record should be taken into account.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10150  Respondent: 10957857 / Adam Aaronson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H2 – Affordable homes

I object to this policy as it will lead to the loss of countryside for no local benefit.

The definition "Affordable" homes, is totally misleading. 80% of Market Value in any of Guildford’s rural districts such as Clandon and the Horsleys is not in any way affordable. These will just be discounted houses for millionaires. The council should be looking to build low cost, social housing that people can afford. This is nothing to do with “Affordable Housing” as defined.

None of the homes proposed under this plan are likely to be homes which are sold or rented at 80% of market value. Even at 70% rented, these are going to be expensive for most people except footballers and hedge fund managers. We need starter homes for local people.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10761  Respondent: 10957857 / Adam Aaronson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY H3 – Rural Exception Homes

This policy is so wide as to almost obviate the need for a local plan. It is effectively a policy that means building anywhere, and ignoring all historic planning restrictions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10772  Respondent: 10957857 / Adam Aaronson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 1533 of 2167
I object to POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty because this policy is insufficient and is a dilution of the former policy. It is dependent on the Surrey Hills Management Plan, which welcomes housing development. The Surrey Hills needs much more substantial protection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9429  Respondent: 10957857 / Adam Aaronson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses.” This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. I do not understand why the Council has permitted this. It seems to amount to a war of attrition being waged on the public by the Council in conjunction with developers. Many residents, including myself, are too busy to write, repeating the same comments to deaf ears. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014.[1] Some residents have concluded that commenting is a waste of time as the Council have their own agenda and are determined to see it through.

I believe that all Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. It is simply wrong to include them in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9480  Respondent: 10957857 / Adam Aaronson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to POLICY P2 – Green Belt

I object in the strongest possible terms to the insetting of 14 villages from the Green Belt, and the proposal that infilling is acceptable within a further 12 villages within the Green Belt. I am also concerned that “infilling” is also proposed outside the settlement boundaries of 11 further villages.
Greenbelt is a binding covenant between the executive and the people and the proposal to inset is a travesty.

While I accept that the definition of “insetting” is valid in planning terms, I think that an inspector should note that it is a highly misleading as most people are unaware that it means “removing from”. In the same way as the electorate were misled over Brexit, they are being misled by jargon that is not clearly explained.

The Green Belt is supposed to be protected as a matter of national and local policy, Policy P2 seeks to justify development in a supposedly protected area, in breach of clear local manifesto commitments and contrary to previous responses to public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9641  Respondent: 10957857 / Adam Aaronson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy P2 and this emails submits additional comments.

The policy omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

- Agricultural production
- Rural leisure and tourism amenities
- Water catchment
- Flood control
- Biodiversity
- Natural heritage
- A carbon sink for air pollution
- Room for public facilities such as parks and burial grounds
- Profitable film locations (e.g. Shere)
- Future economic potential such as mineral extraction (even fracking)
- Natural beauty, landmarks, open space, rural views and sight lines
- Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)[1]
These assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations.

The Council argues that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold.

I am not opposed to appropriate development in the Green Belt, but I fail to see why a system of fair burden-sharing of new development cannot be applied to the borough’s existing settlements in proportion to their size. The plan dumps hundreds of houses on the Horsleys, while burden sharing would minimise the strain on infrastructure and maximise the chances of retaining the character of each settlement through gradual growth. It is reasonable to ask urban Guildford, with a considerably larger population of semi-rural East Horsley for instance, to accommodate a larger proportion of new homes over the plan period.

The current proposal allows speculative development on greenfield sites where building costs are lower, covering the Green Belt with dozens of housing estates that few residents want. 8,086 new houses are planned for the Green Belt but only 1,135 for Guildford urban area. This is disruptive, socially inequitable and unnecessary. It will not only destroy countryside but will also delay and disincentivise much-needed urban regeneration. The remarkable revival and repopulation of central London shows that building dormitory satellite settlements is an out-of-date approach to planning.

I particularly protest at the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages. I do not agree that settlement boundaries should be hugely extended in many villages. I am against the infilling that is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages reflect the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hellbent on self-defeat.

I believe this policy is seriously flawed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

**Comment ID:** PSLPP16/9074  **Respondent:** 10957857 / Adam Aaronson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

**POLICY S1 – Presumption in favour of sustainable development**

I OBJECT to this because although the wording is based on the National Planning Policy Framework (NPPF) – which is of course binding - this policy fails to recognise that development is unsustainable in rural areas, where the infrastructure is inadequate and the transport network cannot cope with the proposed scale of development. This should represent an absolute constraint on development.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/9152  **Respondent:** 10957857 / Adam Aaronson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**POLICY S2 – Borough Wide Strategy**

I object to this policy and the way it has been formulated.

I note that the plan proposes almost 14,000 homes - 13860 homes to be precise.

It appears as if this number has been plucked out of thin air. There has been no opportunity for any informed member of the public to scrutinise it. Nor has this number been scrutinised by councillors despite repeated requests for debate. Indeed, the Council’s scrutiny committee turned down the opportunity to scrutinise it on spurious grounds. From the outset the assumptions and calculations underlying the model are hidden contrary to all basic principles of research. It is completely unreasonable to use a set of unsubstantiated numbers in order to justify major structural change in a widely protected area (89% Green Belt, 44% AONB, approx. 75% protected by SPA).

It seems to me that for the Council to expect the public to believe these unsubstantiated figures is verging on the fraudulent. All attempts to secure the release of the underlying data have been resisted and and should any aspects of this plan be scrutinised by a planning inspector, I hope that they will listen carefully to the transcript of the Council’s scrutiny committee, which I attended as an observer. It is my view that the Scrutiny Committee has let down the electorate.

It is completely inappropriate to allocate this housing number, either over the plan period OR across projected sites, when the number itself cannot be substantiated. Detailed criticisms of the model have been provided by external consultants and members of the public.

If the housing number were substantially lower, and was calculated only to meet housing need, then there would be no need to build on Green Belt land or in the open countryside.

The number of homes proposed, together with existing planning permission, added to expected “windfall” sites, exceeds 13860. Guildford residents would not accept building homes on open countryside to meet Woking’s designated “need” but this seems to be implied.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp171/2412  **Respondent:** 10957857 / Adam Aaronson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Employment land – POLICY E1, E2 - It seems as if GBC has not noticed the change in national trends, which indicate that too much potential development land within the town centre is being allocated for retail or commercial development rather than housing. High added value businesses are welcome in the borough, but much of the employment land is designated for retail or low added value employment floorspace, which only exacerbates current issues such as lack of low cost housing and heavy traffic. Sites such as the Burnt Common Triangle, currently in the Green Belt, are inappropriate for heavy industry,

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2409  Respondent: 10957857 / Adam Aaronson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY P1 and POLICY E5 I am very disappointed that GBC now wishes to weaken the protections offered with their new policy relating to AONB, and remove restrictions on non-major development. This is a move in the wrong direction. Previously all proposals were considered against the 5 key tests – now it appears that the intention is to support development in the AONB. This is weaker, not stronger, and is contrary to huge responses from the public in previous consultations and the weight of protection given to AONB in the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2411  Respondent: 10957857 / Adam Aaronson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Green Belt – POLICY P2, POLICY P3, POLICY E5 and sites

It has been established that exceptional circumstances must be demonstrated in order to develop Greenbelt yet despite the weight of public opinion against weakening of this policy, 70% of proposed new housing development will be in the countryside, of which, 58% will be in Greenbelt.

Quite clearly, this is not an exception and no attempt is made to demonstrate exceptional circumstances, in line with the requirements of the NPPF. The sinister and misleading term “insetting” continues to be used. Most laymen think this means adding to the GreenBelt and protecting a village from development, rather than the contrary. I am concerned about the continued policy of insetting villages since restrictions within the settlement boundary will assuredly lead to loss of character. The Rural Economic Strategy covered in 4.51a, promoting affordable homes everywhere in the countryside including the AONB as a main aim, is a mechanism for promoting overdevelopment in our countryside. It has not been subject to full public consultation and is based on data, which is not up-to-date.

Three major strategic sites – Blackwell Farm, Wisley Airfield and Gosden Hill Farm – are in the Green Belt. Previous consultations show that, in line with the NPPF, the public would prefer to use brownfield land in the urban area first.

Only a few days ago on 18th July 2017, The Communities Secretary, Sajid Javid said “As we have made clear in the Housing White Paper we expect brownfield sites to always be the priority to meet our housing need” in relation to Bradford’s Local Plan. Yet GBC continues with its plan to bulldoze the green belt and not use brownfield land, of which it has plenty.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2408  Respondent: 10957857 / Adam Aaronson  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There are major flaws in the 2017 plan, not least of which is the housing target itself. I object to Policy S2.

Throughout the country, let alone in Guildford and its environs, there is astonishment at the manner in which GBC has steadfastly refused to examine, or permit others to examine the housing target of 12,246 and the basis upon which this has been reached. In the scrutiny committee a councillor stated “one does not have a dog and bark oneself” as a justification for not scrutinizing the GL Hearn figures. If a pharmaceutical company tried to licence and market a drug without making their scientific data available for scrutiny, they would not get approval from the licensing authority. In almost every research field it is part of normal analytical procedure to scrutinize the underlying data. Yet for some bizarre reason, GBC seems to think that it is not necessary to permit anybody to analyze the assumptions that underpin the SHMA. The only logical conclusion that one can draw is that the data must be flawed, because if it could stand up to scrutiny, it would have been released long ago. This flawed data means that the whole plan is fundamentally unsound and I object to it in the strongest terms.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/2224  Respondent: 10958081 / B Panting  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Send Village being removed from the Green Belt.

The Conservative Government gave promises in this regard, when elected for a second time. Completely the opposite has occurred.

I object to the building of 45 houses at Clockbarn Nursery.

Send is already a nightmare driving through it and with more traffic joining it from the various side roads this would make it even more dangerous.

I object to the building of 400 houses and 7000 sq meters of industrial space at Garlick's Arch opposite Send Marsh Road.

On mornings when there has been an accident on the M25 and the A3 becomes blocked, all the traffic surges through Send and Ripley. I am now a pensioner and will not go out on the roads between 7.15 and 9.00 as it can be very frustrating. The area would not be able to cope with the considerable increase in traffic. Especially with the lorries. It is very dangerous even now, when confronting them through Clandon. In addition extra schools and an increase in medical requirements would be needed. More land to be consumed.

I object to the development of 40 houses and 2 traveller's pitches at Send Hill

Here again the infrastructure just cannot cope with the increase of any more people or traffic.

I object to a new interchange with the A3 at Burnt Common because the area is already so overloaded with traffic and people.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3282  Respondent: 10958177 / Brian Cooke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the removal of the Former Wisley Airfield from the Green Belt

I object to the continued inclusion of a site where the planning application has already been unanimously rejected by GBC's Planning Committee

I trust that these objections will be fully considered and that the Former Wisley Airfield,(Three Farms Meadows), Allocation A35 is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/7245  **Respondent:** 10958177 / Brian Cooke  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the threat the Local Plan poses to the historic village of Ockham and to my Hamlet of Hatchford

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/7246  **Respondent:** 10958177 / Brian Cooke  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the impact on transport, local roads and road safety which will be considerable from such an estimated 4,000 extra cars. The railway stations, Cobham, Effingham and Horsley struggle to cope now with parking.

I object to the impact on air quality, which is poor now.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<td>I object to the impact that such a development will have on the environmental and ecological value of the site.</td>
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<td>I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land that could be regenerated.</td>
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<td>I object to the disproportionate allocation of housing in this particular part of the Borough</td>
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Further to my objection dated 20 September 2014 I am again writing to object to the proposed settlement boundary change in Shalford in respect of the area behind Shalford Village Hall. This area of land sits in the heart of the village and is essential to its character and rural feel of the village, despite only being a couple of miles from Guildford. I live in [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] and any future potential development on this site will have a material detrimental effect on my property as the land in question sits above, and looks down upon, my property and garden.

There have been multiple attempts to change the settlement boundary in respect of this land. This was suggested in the last version of the local plan and was vehemently objected to by over 700 local residents. This latest attempt comes despite the council not responding to or addressing the multiple objections to the last attempt. In fact, it would appear that the council has brushed the previous objections 'under the carpet' in the hope that these will not be raised again this time. This is disappointing, to say the least. By repeated attempts to, essentially, do the same thing (i.e. rezone this land) it brings a heavy cloak of suspicion down on the council, as the only reason that can be seen for bringing these changes about appears to be to facilitate future development on this land. If this isn't the intention, then it must be asked why the council are wasting time and money on this when it could be to using this on value adding activities.

Repeatedly asking the same question also suggests that the council is hoping that the local residents will get 'objection fatigue' and start to tire of objecting, allowing this proposal to sneak through. This is not democratic - in fact, it's the opposite, with locals beginning to think that the council has its own agenda regardless of what the local residents think. If the public don't engage because they do not believe that they will be listened to, this cuts across democratic principles.

I would also like to draw you attention to the following objections:

- A report was provided to the council in 2007 (the Landscape Assessment Study, 2007 by Chris Burnett), which reported that Shalford requires protection not further development, with the area sensitive and vulnerable to change. This area requires protection from the council, not rezoning.

- The land behind the village hall was donated to Shalford Parish Council a long time ago by a local villager, for the SPC to protect as open green field land for the whole village to enjoy ‘in perpetuity’. The council previously thought that the green belt and AGLV status would protect the land forever and so they could honour this resident’s wish of it being protected ‘in perpetuity’. This brings into question as to why there should be any change.

- As GBC policy is to protect AGLV land unless in exceptional circumstances it makes no sense to move the settlement boundary behind the village hall as this would open up this green belt and AGLV land to development. No special or exceptional circumstances appear to have been stated.

- This steep elevation on this land would mean that any eventual potential development which could take place would be clearly visible from the village green and the surrounding village. The land is 32 feet higher than the nearby main road and over 25 feet higher than the village hall. As such these elevated fields very much contribute to the openness of the green belt and the attractive village setting - they are in fact like a green oasis of peace which the whole village can enjoy when either playing tennis, bowling or attending meetings or functions in the village hall. This field acts as the green lungs for the already ’developed' village and as such are something which so many people feel passionately about protecting for future generations to enjoy.
• Around the field behind the village hall there are already existing established hedges which have been in existence since before the 1950s. These established hedge rows and fences clearly mark the edge of the settlement boundary and have done so for decades, however they are not visible from aerial maps which also cannot pick up the unusual elevation of the land behind the village hall when calculating settlement boundaries. These form clear ‘defensible’ boundaries to de-mark the settlement boundary and so I see no need to alter the boundary for this reason.

• The Shalford Settlement boundary was originally drawn so that the land behind the village hall which is green belt and AGLV land remains outside of the settlement and thereby retains its critical protected status.

• Local traffic congestion is already a major issue with Chinthurst Lane, where the access would be to the site behind the village halls, already highly congested at rush hour. Chinthurst Lane has also become a favoured parking spot for commuters at the local railway station - which makes the lane almost impassable during the working day. This has resulted in cars mounting the kerbs by the Common to pass each other. Further up Chinthurst Lane, it is a narrow country lane without pavements and is already a dangerous place for young and old to walk along. As someone with a young child, this is of considerable importance to me.

In addition to the concerns above, any development (which surely must be with the intention behind the proposed boundary change) will affect the sight lines from the back of my property as this area is noticeably higher than the rest of the village. Due to this height, any possible future development will be able to look straight down into the windows at the back of my property (and a significant number of the surrounding properties). Of considerably more concern to me is that this area of land provides a significant drainage utility for the lower village. Even now, there is some ‘run-off’ which can be easily identified running down alongside Chinthurst Lane. The scale of this was demonstrated during exceptional wet weather in winter 2013/2014 when the corner of the Common and Chinthurst Lane flooded on a number of occasions (as the lowest point in the area). Development on this site will prevent any existing drainage resulting in increased surface ‘run-off’ which will run down hill and is highly likely to cause flooding to the lower lying properties (including my own) and the Common on a regular basis. Guildford Borough Council has a duty to ensure that this does not happen.

I very much hope that the Council appreciates the strong level of feeling in Shalford with respect to the proposed settlement boundary change and is willing to see sense and not make any such change to the boundary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
to be build and run at full capacity, circa 1000 pupils plus staff would need to “commute in”. Although the school is to be placed near the Wanborough railway station – so that presumably some pupils and staff may travel by train – I anticipate this to be a minority and therefore this means the majority of staff an pupils will arrive by road either in cars or by bus.

- Information about the total and current spare capacity for the surrounding secondary schools has been made available by Surrey County Council, and this shows that some of the local schools are currently running at less than 50% capacity. Together the free capacity in the surrounding schools total 1216 places – more than the total number of place in the proposed Normandy school, and therefore to me this shows that there is no need for an additional secondary school.
- Even if there were demonstrable needs for an additional secondary school to the West of Guildford, my understanding it that there are other sites in the locality – eg Rokers at Fairlands – that have not even been investigated as potential sites.

Focussing on the housing:

- The sheer quantity of the housing proposed (1100 dwellings) will have a devastating impact on the villages of Normandy and Flexford. These are small, relatively quiet, semi-rural villages whose character would be entirely changed by the addition both by increase in the number of residents (circa 175% increase) but also by the density and suggested affordability of the housing stock to be included in the development. To me, this is not either “sustainable” or “sensitive” development, it is better surmised as the insertion of a whole new village.

I trust that this provides useful feedback and look forward to confirmation that the site A46 will be removed from the submitted local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8247  Respondent: 10958337 / David Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

With regard to the scheme as a whole:

- The plan gives no significant thought to the increase in traffic on the local roads due to either the proposed school or the housing. The plan merely seems to indicate that work would need to be done by the developer and does not take a view on whether it would be feasible to actually accomplish this. Certainly, if the majority of residents in the proposed development and the majority of pupils and staff travelled in and out by using Glaziers Lane and Westwood Road, I cannot see how the junctions with the A323 would cope, nor how they could actually be “improved” in order to cope with the additional traffic.
- Another infrastructure consideration that seems to have almost been overlooked is the capacity for wastewater disposal in Normandy. We have recently have had to have a non-return valve installed to prevent wastewater from backwashing through our drains, which is an effect of the exiting wastewater provision being unable to cope with the exiting demand – let alone with an additional 1100 homes and a 7 form secondary school!
- Much is made of the ability for the pupils and residents of the new village to use the existing Wanborough railway station. However, for the pupils that are envisaged to come in from the proposed Blackwell Farm
development, they won’t be able to commute by train until 2033 for at east 10 years – at the touted Guildford West station won’t be built until then!

In short, I do not believe that any of this add up to the so called “exceptional circumstances” that GBC have said themselves would need to be tabled in order to warrant the release this parcel of land from Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
In terms of the connection to the proposed Guildford West railway station (A59) there does not seem to be a clear commitment that there will be pedestrian and or bicycle access to the new railway station from the area of development. I suggest a dedicated pedestrian/bicycle access provision should be made avoiding the roads on the Research Park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | pslp172/3351 | Respondent: | 10958337 / David Wright | Agent: |
|-------------|---------------|-------------|--------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2017 / Policy A29 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- My concern lies with the parcel of land bordered by the A331/A31 and The Street in Tongham. Part of this land is currently being used for the growing of hops by the Hogs Back Brewery, celebrating the historic cultivation of Hops in the Farnham area. As such I would be disappointed to see this area used for housing and undermining land adjacent to the brewery which is being used as an agriculture/green space for the supply of local ingredients for the brewery.
- Given the proposed removal of A30/LRN21 (Ash Level Crossing) – which is already a traffic pinch point – and the additional traffic that could be expected to use Foreman Road to access the development, should consideration be given to facilitating a better junction between the A31 and White Lane? I am aware of a number of serious accidents that have taken place at this junction (due to cars either crossing or attempting to join the Northbound carriageway) and so I feel that with the proposed increase of houses in the areas – and hence vehicles that may be attempting to exit/join the A31 at this point, there will be further incidents if the junction is not improved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | pslp172/3352 | Respondent: | 10958337 / David Wright | Agent: |
|-------------|---------------|-------------|--------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2017 / Policy A30 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
• I do not agree with the removal of this provision for a bridge instead of the existing level crossing. As noted above, this is already a traffic pinch point, and given the size of the proposed development on A29, additional vehicles will be using Forman Road, which joins the A323 at the exiting level crossing. I would like to see this re-instated, together with a better junction for vehicles wanting to use Forman Road. I accept that this will cause land to be used for infrastructure rather than housing but given the area of land assigned to A29, I believe this is an acceptable trade-off. Get Surrey are reporting that First-MTR (the new operator for the South West area of the National Railway) are intending to re-introduce a dedicated Guildford – Farnham rail service (see http://www.getsurrey.co.uk/news/surrey-news/south-west-trains-franchise-farnham-12844991), which would presumably increase the number of times that the level crossing barriers were down in a day and therefore cause further disruption to the traffic flow in that area.

• If this scheme were re-introduced, I would like to see it extended to facilitate improvements to the junction between the A323 and the B3411, which is another traffic pinch point in the local area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3353  Respondent: 10958337 / David Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I am pleased to see the removal of this land parcel from the plan and the proposed relocation of the school to Blackwell Farm.

• However, I do not see the need to modify the Green Belt boundaries so that the villages of Normandy and Flexford are inset from the green belt, and hence request that this be removed from the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3354  Respondent: 10958337 / David Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A59

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Whilst I broadly support the inclusion of the new station I would like to see some commitment that the inclusion of this station on the North Downs line will not lead to a reduced service for Wanborough station.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/424  Respondent: 10958465 / Oliver Meade-King  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (south)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to any possibility of the land behind the village hall in Shalford ever being made available for development. It is part of the green heart of the village and would further increase traffic issues on already very congested roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/4377  Respondent: 10958561 / James Grant  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I'm writing to state my continued rejection of the proposed local plan by Guildford Borough Council, with specific reference to the East and West Horsley borough.

My objections centre around a number of key themes:

- **The Greenbelt status of East and West Horsley**
  - I am completely opposed to the removal of West Horsley's Greenbelt status by the method of 'insetting' and the subsequent extension of the Local Plan Settlement area boundaries (2003).
  - The **Greenbelt status of West Horsley** is one of the key reasons people live here - we are located approximately 8 miles from Guildford, 8 miles from Leatherhead and 8 miles from Dorking - if I wanted to live in an urban centre dwelling I would, and I would choose one of those large towns. I actively choose to live in the Greenbelt and moved to West Horsley 4.5 years ago (from Guildford) for the precise reason that the Greenbelt was first created - because the green area and countryside act as my daily 'lungs' to a working life in the metropolis of London.
There are no exceptional circumstances, nor is it clear what GBC propose those circumstances to be, in order to justify new Greenbelt boundaries. I cannot see any reason why the Greenbelt areas are being targeted, outside of developer pressure.

It is clear that expressed views of residents are being ignored - whether in previous consultations (2014) that I understand are not presented to the Independent Planning Inspector, or in council elections where the emergence of newly formed resident parties (Guildford Greenbelt Group), or finally in General Elections where the local Conservative MP - Paul Beresford had to acknowledge that the Greenbelt was of higher concern to constituency members than the economy (http://www.dorkingandleatherheadadvertiser.co.uk/general-election-2015-meet-candidates-vying-votes/story-26017300-detail/story.html). At what point will GBC listen to its residents?

Finally, the Guildford Borough Economic Strategy 2013-2031 makes no case for proposed housing development in large volumes within East or West Horsley or even the surrounding villages. I understand this to be a Key Evidence document and urge it to be considered as such.

- **Infrastructure (Policy I1 - Infrastructure and Delivery)**
  - **Schools.** The current state Primary school (The Raleigh) is oversubscribed, with an annual intake of 60 new pupils a year. Whilst an excellent school it has already reached the limits of its current site, and having been over-subscribed for many years it is clear that the current policy for state school primary education is inadequate today, let alone with proposed expansion, and certainly not at the levels suggested by the Local plan as part of the insetting process. Within the village there are also two private schools that cater for primary school education and they both operate with high class numbers. Furthermore, there is a significant traffic issue caused today by all three schools within the area - there is insufficient parking for the Raleigh and the Glenesk school, and Cranmore school causes traffic volume issues and jams on the A246. With regards to senior schools the Howard of Effingham also operates at capacity, and there are no plans to develop that school (planning permission for expansion has been rejected) or to build an additional facility. Senior schools the villages of both Effingham and Bookham are also subject to Local Plan initiatives and proposed housing, which will increase the capacity issues on the Howard and potentially even move West and East Horsley out of the catchment area for the Howard of Effingham. Indeed the current situation is so dire that I question where on earth GBC propose the current children in the village will be going to school for the next 5/10/15 years? I am yet to see a plan to cope with the current turnover of home sales as older generations downsize to young families moving out of London, all of which is adding pressure to existing school facilities and without any housing development.
  - **Medical facilities.** The Doctors surgery in the village (Kingston Avenue Medical Centre) is full! It is very difficult to get an appointment in advance with a typical waiting time of at least two weeks. Emergency appointments entail waiting for up to three hours for a slot to open, in the winter this situation can typically be worse with an increase in young children/older residents requiring increased attention. The local hospital is based in Guildford (the Royal Surrey) and is also a medical facility under stress. Whilst an excellent hospital it manages high numbers today but would be expected to manage a huge population increase should the multiple developments in the Local Plan (not just the Horsleys) go ahead. The medical facilities operate under duress within todays population, the proposed Local Plan development would prove too much, and there are no plans for increased facilities.
  - **Train.** Within the last 5 years there has been a significant shift in the commuter patterns on the stopping service that runs from Horsley to London or Guildford. There is a marked increase in the number of commuters who access the train at both Clandon and Horsley, which means the trains capacity is typical full by the time the train has passed through Cobham and Stoke D’Abernon. Whilst anecdotal evidence it appears that the villages on this train line (Clandon, Horsley, Effingham and Cobham) are all undergoing a demographic shift as older residents move out of the area and young families who require commuter access to London are replacing them. The station at Horsley is currently manned for half a day (till 1pm) on weekdays and none on the weekend, it has no toilet access after 1pm on weekdays and none on the weekend, it has no wheelchair or buggy access to Platform 1 (which serves London) and the car park facility is full every weekday. If you also consider that Horsley station is situated on the 'Suburban' line, there is also an issue with the service - the trains do not have toilet facilities, this means that a typical journey (45 mins fast train or 53 mins standard train) can entail 1-1.5 hours of travel with no toilet access once combined with a walk or drive commute (as the husband of a wife who has experienced two pregnancies whilst also commuting to work in London I can assure you that this is not a laughing matter), there is also no air conditioning on the trains, and finally - the Suburban line...
always has to give way to the faster 'A' line (which serves Guildford, Basingstoke and Woking), you can see that the current train service is not suitable for large scale development. And certainly not the development of an additional 35% of new homes when compared to the current number of homes.

Road. Some of the B roads around West and East Horsley are some of the worst road surfaces I have ever known. Indeed, the junction of East Lane and Ockham Road South may be the very worst (in East Lane), and this is one of the roads that serves both the Raleigh and the Glensk primary schools - indeed it is only a matter of time before there is an accident (car or bike) that is attributable to the road surface. The village also has a problem with speeding drivers - the Ockham Road is used as an access road to the A3 and as such sees high volumes of traffic, at high speeds, during commuter hours. The railway bridge serving the station has also suffered lorry strike multiple times in the last 3 years, even with updated visibility measures that were added in the last two years. Increasing traffic volumes with the addition of new housing will only serve to exacerbate all of the existing issues that are faced on the road.

Flooding. Every winter the village experiences some flooding issues, most notable on the Ockham Road exit onto the A3/Ripley roundabout and also on East Lane in between two of the proposed development sites (A38 and A40). The development of the A38/A40 sites will remove natural flood countermeasures and exacerbate surface water run-off and only further impact the safety of the road during the winter, but the proposed development will also increase the volume of traffic in the village and create further issues across all sites that experience flooding and high water run-off.

- **Sustainable development.**
  - The proposed development of 385 homes on the 4 proposed sites are at much higher density levels than the current village settlement, and will have a big impact on the character of the village, not to mention the infrastructure points addressed above.
  - **Sustainable transport (Policy i3).** Developers are only expected to propose travel plans for development, and contribute to transport arrangements for the able and disabled. This is completely unacceptable - as detailed above the current transport infrastructure is under pressure and will not be able to cope with development, either during the work or after. It is completely unacceptable for GBC to propose that local residents (already opposed to the Local Plan) must suffer disruption and chaos to travel during the works, and then 'put up' with reduced transport infrastructure post the development. There is clearly no intention within the Local Plan to force developers to pay for infrastructure development.
  - **Village expansion is unsustainable.** With limited shopping facilities, limited public transport facilities (bus network and train/train station facilities), limited public parking (already under pressure) high numbers of young families in the area it is simply inconceivable that the village has the capacity to undergo expansion, limited or significant. I see no case for Policies S1 in favour of Sustainable development.

Finally, I note also that the development of Wisley Airfield continues to feature in the Guildford Local Plan, with a proposed 2,000 houses on that site. Located under two miles from the Horsleys it is impossible to see how GBC plans to develop either, or both, of the proposed settlements without significant impact on the Horsley villages as per all of the points above. Wisley Airfield will also contribute to huge traffic issues on the A3/M25 junction (10), notwithstanding the issues that already exist - I invite the Planning Inspector, and the GBC Councillors, to start queuing from the A3 onto the M25 during rush hour every weekday morning - the queue starts at 7am and doesn't abate until after 8.30am. Furthermore I would ask that the Inspector request information from the Highways Agency on the number of times a year that they have registered delays between Junction 9 and 12 due to the high volume of traffic joining/exiting the M25 onto the A3.

The development of Wisley airfield is also unsustainable for all of the reasons mentioned above - that development will also impact the Horsleys. I also struggle to see how it can be justified when only 15% of the airfield is designated as brownfield site.

I hope that the Independent Planning Inspector will be able to view and validate the concerns I raise above, and I hope that the Local Plan is rectified as required and the proposed housing developments are moved to areas that are more suitable, preferably not part of the Greenbelt and in parts of Guildford where the infrastructure can sustain population growth.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
**Comment ID:** PSLPA16/1604  **Respondent:** 10958753 / Ingrid Molossi  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick's Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

**Comment ID:** PSLPA16/1605  **Respondent:** 10958753 / Ingrid Molossi  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The "objectively assessed need" figure of 693 homes a year is too high. A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects. The current SHMA inflates the proposed housing figure due to failure to correct for errors in the historical data for international migration flows, issues with the way it considers students and affordability and flaws in the method for estimating the number of homes needed to support job growth. It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.
The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3063  Respondent: 10958753 / Ingrid Molossi  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Gosden Hill development being in the Local Plan The land in Gosden Hill does exactly what the Greenbelt was designed to It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham's sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.
There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England's requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an "aspiration" in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPS16/3064 | Respondent: | 10958753 / Ingrid Molossi | Agent: |
|-------------|---------------|-------------|--------------------------|

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8).

There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brownfield site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community
Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council's own Green Belt & Countryside Report does not address Garlick's Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy 13).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy 03).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy 14)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy 11)

Furthermore, several electricity pylons run through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPS16/3065</th>
<th>Respondent:</th>
<th>Ingrid Molossi</th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of 'through' traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6656  Respondent: 10958753 / Ingrid Molossi  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick's Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6653  Respondent: 10958753 / Ingrid Molossi  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick's Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B2b) at Garlick's Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick's Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/6654  **Respondent:** 10958753 / Ingrid Molossi  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. I OBJECT to the location for new employment floorspace at Garlick's Arch - Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and BS) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick's Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/6655  **Respondent:** 10958753 / Ingrid Molossi  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick's Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT. Tourism and visitors do not depend on new visitor "attractions" and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/"Disneyfication". Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many "leisure and visitor attractions" already. The case for creating more is not made and no examples are given. Instead, the plan's explicit priorities should be:

1. To protect the borough's prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford's river landscape less off-putting and support town-break packages for high-value tourism To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

2. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An "English town break" (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

3. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT (POLICY H1- Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6662  Respondent: 10958753 / Ingrid Molossi  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H3 - Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the "mix" this can include "market" housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances."

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/6657  **Respondent:** 10958753 / Ingrid Molossi  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

1. **I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)**

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

**I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.**

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular pastime, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/6658  **Respondent:** 10958753 / Ingrid Molossi  **Agent:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick's Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents' in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick's Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6659  Respondent: 10958753 / Ingrid Molossi  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy 12)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already
at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6660  Respondent: 10958753 / Ingrid Molossi  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that "Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health." The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6637  Respondent: 10958753 / Ingrid Molossi  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to one specific aspect of the consultation process which is fatally flawed. The Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the green belt." This is demonstrably untrue and I believe it is deliberate untruth which compromises the consultation process. Even the council's position in the draft Plan is that exceptional circumstances exist so as to justify taking areas out of the Green Belt - which by definition has a detrimental impact on the Green Belt. This unqualified statement cannot be justified and is simply untrue. By giving this unqualified assurance to residents that there is no detriment to the Green Belt residents may have been reassured and dissuaded from responding to the consultation.

I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (We assume the document was delivered to most houses in the Borough .) I have no
doubt that that people will argue before the inspector that the consultation process was flawed and ineffective because of this.

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/6647</th>
<th>Respondent: 10958753 / Ingrid Molossi</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<th>Comment ID: PSLPP16/6650</th>
<th>Respondent: 10958753 / Ingrid Molossi</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding.

Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6641  Respondent: 10958753 / Ingrid Molossi  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overa ll housing figure, which would be very reasonable and sensibl This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including These now need to be revised downwards, possibly quite seriously.

3. The housing number is based on an arbitrary Housing Market Area (HMA); the "West Surrey" tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it.

The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPA16/4305</th>
<th>Respondent: 10958817 / Steve Wright</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the SANG being proposed for Russel Place Farm. The concept of SANG (Suitable Alternative Natural Greenspaces) – is ridiculous, just don’t develop the original greenbelt! Wildlife cannot be moved, would not survive even if they were (i.e. deer, badgers, foxes, etc) and people will not travel to these ‘sites’.

- If this SANG goes ahead it will force the local farmers out of business, making many redundant. This farm is critical to the Wood street residents and the farm helps to maintain small-holding like mine.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPA16/4306</th>
<th>Respondent: 10958817 / Steve Wright</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not agree with the housing figure projections that has been published. No calculation method or facts have been substantiated.

- The housing figures do not take into consideration current/planned sites that are being considered for development. There are many sites that are not part of the local plan i.e. Rokers application for 350 houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPS16/7977  **Respondent:** 10958817 / Steve Wright  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object specifically to any building on Blackwell Farm of the surrounding area on the hogs back for the following reasons:

This areas is designated as AONB and Green Belt and should not be built on!

- Any development would destroy existing wildlife that occupies and relies on this land – deer, birds, etc.
- The impact on traffic on hogs back which is already at a standstill every day coming into Guildford. The road and infrastructure around Guildford cannot take additional housing near the hogs back, Blackwell farm and University.
- The housing proposed at Blackwell farm area which is owned by the University is not ‘affordable housing’ or housing that would be used by students. There is already buildings in Park Barn and around the hospital area that needs major investment which could also address housing needs whilst regenerating the area.
- We do not need any more office building and expansion of the Research park.
- We should not make any provision for ‘Travellers’ [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]. There are other cheaper more appropriate sites in the country that could be used.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/7978  **Respondent:** 10958817 / Steve Wright  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

The connection between Guildford Council and the University is unhealthy and should be investigated for corruption/collusion. They were allowed to buy the land near Blackwell farm under condition that the land would not be developed and would remain green belt – this is being ignored. The University have land which is already approved for housing which has not been developed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/17649  **Respondent:** 10958817 / Steve Wright  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

The connection between Guildford Council and the University is unhealthy and should be investigated for corruption/collusion. They were allowed to buy the land near Blackwell farm under condition that the land would not be developed and would remain green belt – this is being ignored. The University have land which is already approved for housing which has not been developed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Page 1567 of 2167
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
| Guildford is a nice place to live - nice countryside (currently) and close to London. Therefore, Guildford council need to stop trying to meet all housing requirements and except that the town may not be able to meet these growth targets unless they ruin what is currently appreciated by residents – please stop trying to run the town as a business obsessed with growth, making money and purely business/commercial interests. Residents should have more of a voice. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

| Comment ID: PSLPP16/17647  Respondent: 10958817 / Steve Wright  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
| In general, I object to any building on land that is classified as the ‘green belt’. There may be exceptional cases but house building does not qualify. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

| Comment ID: PSLPP16/17648  Respondent: 10958817 / Steve Wright  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
There are many suitable ‘brown field’ sites around Guildford that should be used and considered to meet our housing requirements. We need to consider other ideas of building above (over) car parks for student and affordable housing. Council planners need to move big retail parks more out of town and use these sites for housing i.e Lady mead retail park.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/17650  **Respondent:** 10958817 / Steve Wright  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My children are likely to work in London and want to live in town close to the station. There isn’t sufficient housing in the town. Instead we build large supermarkets, retail parks and encourage more cars into the town, these sites could have been used for housing.

- The area around the train station is poorly designed for cars and access to and from the station is crazy. This should be a priority for improvement!
- The main roundabout in the centre of Guildford and traffic around the roundabout which also affects the station and all spur roads into and out of Guildford is absolute crazy!
- The local plan should deal with this type of long term vision, development and strategic improvements not plastering over and digging up green fields!

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** SQLP16/2015  **Respondent:** 10958817 / Steve Wright  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

If this development continues I will leave Guildford.

Finally, the consultation process is a joke. I tried as much as possible to take an interest and to present my view but there is far too much jargon used by all concerned which is not understood by the public i.e. SHMAR, SANG, Safe guarded land which means the opposite, etc. The council do not want consultation they just seem to want to push through their original
ideas without any discussion. I haven’t seen any of the comments raised in the first round be incorporated into the new version of the local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/4346</th>
<th>Respondent: 10958913 / Alan Batterbury</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the proposed Infrastructure Schedule (Appendix C)</td>
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<tr>
<td>The infrastructure schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick's Arch (A43), so the plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the Strategic Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)</td>
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<tr>
<td>The Plan's proposed growth is based on the SMHA report, which says that 693 homes a year are required by the borough, which is more than double to figure of 322 used in previous plans.</td>
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<tr>
<td>But because the council will not publish the SMHA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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</table>
**Comment ID:** PSLPS16/8012  **Respondent:** 10958913 / Alan Batterbury  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land at Garlick's Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch is protected from development as it is classified as Green Belt. There are no exceptional circumstances which allow for its removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance.

The site is wholly inappropriate because:

- There is no sustainable transport infrastructure
- The site is liable to frequent flooding
- The site has ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.
- There are no plans to improve schools, medical or utilities to cope.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLP16/17737  **Respondent:** 10958913 / Alan Batterbury  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The Garlick's Arch (A43) proposal would permanently destroy the character of the ancient woodland site, which includes over 80 ancient oak trees.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/17739  **Respondent:** 10958913 / Alan Batterbury  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the employment strategy and impact at Garlick's Arch (A43) (Policies E2 and E5)

There is no need for new industrial sites at Garlick's Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7000 sq m proposed. The site was removed from the Plan without and reasoning.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17731  Respondent: 10958913 / Alan Batterbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object due to the congestion that development will cause to the local village roads and lack of road infrastructure (Policy 11)

There is already far too much traffic in our villages and this plan will further create more congestion in Ripley, Send and Clandon. The existing roads are in poor quality and in particular the rural roads are extremely narrow and in some areas there is no provision for footpaths or cycle lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17745  Respondent: 10958913 / Alan Batterbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the lack of proper infrastructure planning for sites (Policy l1)

The Plan does not identify suitable infrastructure improvements to provide the huge scale of development, especially at Garlick's Arch (A43) which has no infrastructure projects in the infrastructure schedule to support it. Local services, utilities and sewerage, medical services and school are already nearing full capacity.

I wish these objections to be fully taken into consideration and that the plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17738  Respondent: 10958913 / Alan Batterbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to poor air quality concerns (Policy l3)

Due to the increased number of cars the area would be subjected to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17734  Respondent: 10958913 / Alan Batterbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with the sites of Wisley Airfield (A35) and Garlick's Arch there are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/17736  Respondent: 10958913 / Alan Batterbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development in areas which are at risk to flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by the National Planning Policy.

The site at Garlick's Arch (A43) is classified by the environment agency as being in a higher risk than the councils own assessment. This area has flooded on numerous occasions in recent years and therefore the Council's assessment is not sufficient to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17730  Respondent: 10958913 / Alan Batterbury  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016)

I object to the Local Plan as the development proposed is not sustainable (Policy S1)

The proposed number of 13,860 new houses in the area of Ripley, Send and Clandon is not sustainable. This development will ruin the local community and surrounding area, as there are no railway services, for Wisley Airfield (A35) and Garlick's Arch (A43) and the bus services are inadequate, it will bring in more cars to the area and most households have more than one vehicle. The plan had nothing to improve the infrastructure for Garlick's Arch.

The development should be relocated to urban areas where there is more sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2123  Respondent: 10959009 / Rebecca Claridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2128  Respondent: 10959009 / Rebecca Claridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2118  Respondent: 10959009 / Rebecca Claridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

   1. **POLICY A25 - Gosden Hill Farm**

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.
The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcots Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.
The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

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A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.
Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).
I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<thead>
<tr>
<th>Comment ID: PSLPP16/9030</th>
<th>Respondent: 10959009 / Rebecca Claridge</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9035</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4</td>
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</table>
I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8978  Respondent: 10959009 / Rebecca Claridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
| Comment ID:  | PSLPP16/8984 | Respondent:  | 10959009 / Rebecca Claridge | Agent: |
|-------------|--------------|--------------|-----------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy E2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): ( ) |
| I OBJECT to the location for new employment floorspace (Policy E2) |
| I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt. |
| Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites. |
| There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

| Comment ID:  | PSLPP16/8989 | Respondent:  | 10959009 / Rebecca Claridge | Agent: |
|-------------|--------------|--------------|-----------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy E5 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): ( ) |
| I OBJECT to the loss of rural employment (Policy E5) |
| Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

| Comment ID:  | PSLPP16/9045 | Respondent:  | 10959009 / Rebecca Claridge | Agent: |
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| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy E5 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): ( ) |
| I OBJECT to the loss of rural employment (Policy E5) |
| Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |
I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a South West Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9015  Respondent: 10959009 / Rebecca Claridge  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.
I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9040  Respondent: 10959009 / Rebecca Claridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8999  Respondent: 10959009 / Rebecca Claridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment
without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I
cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood
risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8958  Respondent: 10959009 / Rebecca Claridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including...
Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”.

Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with...
only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This
distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated
housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by
Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden,
protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious
doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims
their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not
transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated
on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical
because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable
because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local
and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in
due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent
years, housing starts have on average been less than half the proposed rate. This is not because developers do not have
the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more
important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning
permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these
adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can
be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan”
that fails to propose a target number that takes all the standard constraints and adjustments realistically into account,
leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline
figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of
Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA).
Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible
change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the
housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would
remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the
plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s
commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than
elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase
availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere.
Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter
belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green
Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints.
It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to
have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is
needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up
urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable
development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and
surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the
local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The
edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the
area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  SQLP16/1235  Respondent: 10959009 / Rebecca Claridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

2. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated...
an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.
5. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
6. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
7. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
8. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
9. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
10. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
11. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
12. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
13. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
14. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
15. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
16. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
17. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
18. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
19. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.
The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1250  
Respondent: 10959009 / Rebecca Claridge  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6693  
Respondent: 10959073 / Janine Light  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
It is vital that villages like West and East Horsley are maintained in their current size to maintain historical values that are fast diminishing. It is important that our young are able to continue to live in such beautiful, historic areas of England, where they can still see history for themselves.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6691  Respondent: 10959073 / Janine Light  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I live along Long Reach, West Horsley, a road that is not suitable for heavy vehicles. This road is very narrow and plagued with pot holes, this year alone I have damaged 5 tyres on my car !!! It is not always possible to see where the pot holes are when it has rained and the road is flooded. Long Reach floods every time we have any rain. Will new drainage be put in to support Long Reach?

I am concerned that the land proposed to build on in Long Reach has natural gas pipes under the fields. This certainly doesn't give me confidence regarding our safety.

How will the local schools, medical centre cope with this huge increase of population? Will my granddaughter be able to attend school in the village with such a huge increase of population?

I am strongly apposed to the volume of proposed Development Sites. This is a small village, which does not have the infrastructure to cope with this huge increase of population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6692  Respondent: 10959073 / Janine Light  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Long Reach is not able to sustain a volume of heavy vehicles, the road is too narrow to cope with heavy vehicles. We only have approximately 3 to 400 metres of pavement. Within the last six months a dog was killed by a fast driven car outside my house. Vehicles drive very fast along the road making it very difficult to safely walk. I have a two year old granddaughter, we are unable to walk along the road (no paths) due to the increase of vehicles using the road, the majority of cars drive as if they are on a race track.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/4494  Respondent: 10959265 / Inger & Ron Ward  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/4495  Respondent: 10959265 / Inger & Ron Ward  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
- failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability and
- flaws in the method for estimating the number of homes needed to support job growth.

• It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Respondent: 10959265 / Inger &amp; Ron Ward</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/8188  Respondent: 10959265 / Inger & Ron Ward  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Green Belt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two-way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size. Electricity supply is also inadequate and would require a big infrastructure development.
The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.
The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8189  Respondent: 10959265 / Inger & Ron Ward  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8190  Respondent: 10959265 / Inger & Ron Ward  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8214  Respondent: 10959265 / Inger & Ron Ward  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18402  Respondent: 10959265 / Inger & Ron Ward  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/18488 **Respondent:** 10959265 / Inger & Ron Ward **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/18399 **Respondent:** 10959265 / Inger & Ron Ward **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could...
accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be
developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far
more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18400  Respondent: 10959265 / Inger & Ron Ward  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the
Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at
Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further
development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18401  Respondent: 10959265 / Inger & Ron Ward  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified
villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses,
which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ
dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will
result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/18408  Respondent: 10959265 / Inger & Ron Ward  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT  This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18495  Respondent: 10959265 / Inger & Ron Ward  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E6 - The leisure and visitor experience

I OBJECT  Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:
1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18406</th>
<th>Respondent: 10959265 / Inger &amp; Ron Ward</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18403  Respondent: 10959265 / Inger & Ron Ward  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

1. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/18489 | Respondent: 10959265 / Inger & Ron Ward | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.
The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/18490  **Respondent:** 10959265 / Inger & Ron Ward  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/18404  **Respondent:** 10959265 / Inger & Ron Ward  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2
I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18491  Respondent: 10959265 / Inger & Ron Ward  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18405  Respondent: 10959265 / Inger & Ron Ward  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/18492  Respondent: 10959265 / Inger & Ron Ward  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/18397  Respondent: 10959265 / Inger & Ron Ward  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to poor air quality concerns (Policy I3)

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/18397  Respondent: 10959265 / Inger & Ron Ward  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional
circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/18398  **Respondent:** 10959265 / Inger & Ron Ward  **Agent:** 

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/18395  **Respondent:** 10959265 / Inger & Ron Ward  **Agent:** 

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a resident of East Horsley I strongly **object** to much of the the Proposed Submission Local Plan in respect to East and West Horsley.

I question the Borough housing targets set out in Policy S2. I therefore accordingly **object** to Policy H2.

I **object** to the proposal to inset East Horsley from the Green Belt and request that this proposal be dropped from the Local Plan.

I also **object** to the proposed East Horsley boundary change which cannot be justified.

I **object** to the proposal to designate roads south of the A246 as being within the identified boundary of East Horsley village and to allow limited infilling within this area.

I believe that the failure to address the inadequacies of the existing infrastructure to meet the current needs of East Horsley is already a serious deficiency in the Proposed Submission Local Plan and I **object** to the infrastructure proposals on these grounds. I also strongly **object** to the proposals for the East Horsley infrastructure in that they do not meet the stated objective of providing a timely infrastructure to support the proposed developments.

I consider that the proposed western movement of the East Horsley settlement boundary needed to bring site A39 within the settlement area as unjustified and contrary to NPPF rules. If this boundary movement is invalid, as I believe, then this site remains a part of the Metropolitan Green Belt, as such and with no ‘very special circumstances’ to justify housing development on it I **object** to Policy A39.

I strongly **object** to the site allocation policies A37, A38, A40 and A41.

These four policy sites are all located within the Green Belt. One is a partially brownfield development but the other three sites are all used for agriculture and all sit within the current Green Belt at the edge of the Settlement Area. The reasons presented by the consultants to justify these settlement boundary movements appear to me unfounded and in no way meet the requirements of the NPPF.

These boundary movements clearly represent a deliberate pushing back of settlement boundaries in order to provide more greenfield sites for housing development. As such, I consider these proposed movements in settlement boundaries must be reconsidered.

These proposals appear contrary to the principles of the Metropolitan Green Belt.
I also strongly object to Policy A35.

I object to the proposal to remove Wisley Airfield from the Green Belt and the enormity of the proposed development of it, due to the strain it will place on existing infrastructure and amenity.

I object to Policy E2 insofar as it omits to confer "public transport interchange" status on Effingham Junction Station without good reason.

Obviously I appear to strongly object to many aspects of the Proposed Submission Local Plan which although I appreciate has had much time spent compiling and revising, still fails to address the ‘objective’ in a manner acceptable to the majority of residents affected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18481  Respondent: 10959265 / Inger & Ron Ward  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to
increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18482  Respondent: 10959265 / Inger & Ron Ward  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.
2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of
the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp171/1661</th>
<th>Respondent: 10959297 / Brian Benton</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I am objecting to the local plan as Guildford B.C. will not tell us how they arrived at the number of houses required. The traffic around Burpham is often chaos due to the past decisions of Guildford B.C. The plan for Gosden Hill will make the traffic significantly worse. Guildford B.C for whatever reason, seem to approve the most stupid major planning applications in spite of the objections of local people and when those objection are proved correct ignore their responsibility. GBC have proved their inability to make sensible judgements regarding the local plan. Listen to and accept the views of Burpham Community Association, they represent a much more realistic and reasonable view.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/11</th>
<th>Respondent: 10959425 / Jan Lofthouse</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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INFRASTRUCTURE: Too little too late

- There is no new road bridge over the railway for our physically divided town and no central, all-directions bus interchange.
- Vague proposals for a “Snake” (Sustainable Movement Corridor) and A3 improvements offer too little too late.
- Land is not safeguarded for A3 tunnel entrances or the “Snake”.

Page 1623 of 2167
Residents are disturbed that no one has had a chance to look at a crucial piece of evidence that should have informed the Plan - the long awaited Strategic Transport Assessment.

HOUSING: Inflated, ignores constraints and doesn’t address needs

- Too high Housing Target proposed in the Plan – over 13,500!
- At 693 homes a year, this is over double the previous figure of 322.
- The Plan’s proposed growth is based on a Strategic Housing Market Assessment (SHMA) report which inflates so-called need, is distorted by student numbers, and is based on commercially confidential modelling assumptions that cannot be checked.
- All other Councils in Surrey, apart from Guildford, are applying “constraints” to reduce their overall housing figure (*see notes).
- The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (eg Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford.

Councillors have made a political choice to open the floodgates to expand Guildford on the damaging scale proposed. This Plan is unsound and unsustainable.

Councillors need to make improvements to the Plan before it is too late and irreparable damage is done to our beautiful historic town and the surrounding countryside

Protect Ockham and Ripley or ruin it, the choice is yours, there are plenty of derelict sites to build upon and so why not use them instead of taking away our space and air and greenery and beauty

Improve ugly sites

Leave our Green Belt alone

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<table>
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<th>Comment ID: PSLPA16/429</th>
<th>Respondent: 10959425 / Jan Lofthouse</th>
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1. EXCESSIVE HOUSING NUMBERS

I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPA16/501</th>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong></td>
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<tr>
<td>Also I object to the draft Local Plan as the SHMA (Strategic Housing Market Assessment) figures seems to be overstated and have now been overturned by experts outside G B C which need re assessing urgently</td>
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<tr>
<td>You do not need to touch the green belt at all, your housing needs are incorrectly calculated</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong></td>
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<tr>
<td>I understand the SHMA FIgures for Guildford B C are to be revised</td>
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<td>Following BREXIT</td>
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<td>and Following errors made</td>
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<td>I therefore object to the draft Local Plan as the Housing figures are incorrect</td>
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<td>If you correct the figures my understanding is that at least 100 dwellings per annum for 20 years would be removed from the figures for Guildford Borough</td>
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<td>So that is well in excess of 2000 homes and once that is the case, G B C really does not and should not develop green belt sites</td>
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<td>I request that the figures be re visited</td>
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<td>I request that G B C do focus now on derelict land, ghastly brown field sites and develop those and leave countryside alone</td>
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<tr>
<td>There is no need to touch the green belt</td>
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</table>
I oppose the Draft Local Plan produced by G B C to include the following points of objection:

INCLUSION OF GREEN BELT SITES AS STRATEGIC SITES and removal of Green Belt areas from the Green Belt

Wisley Airfield, Three Farms Meadows Ockham is Green Belt and not appropriate as a sustainable development and should not be a strategic site when G B C Planning Committee last month turned down the application for a new town on 14 grounds, unanimously

It is clear the experienced planning Councillors considered this a non starter as do developers in the area, they would not touch the site in any event

It is unsustainable

Air quality is poor at the interchange of M25 and A 3, at Junction 10

Wisley R H S is expecting half a million new visitors a year, imagine this extra congestion and poor air quality if in addition TFM has a further 2000 dwellings right opposite RHS Wisley on the other side of the A3

Please refer to the 14 objections your Councillors unanimously upheld, drafted by your G B C Planning Department. All upheld. All meaning that this is the wrong development in the wrong place

Please remove it from the Draft Local PLan as a strategic site now

This is squeezing a new town between tiny villages of a few hundred houses and people living there

It will ruin the farmland; It will ruin Ockham; It will ruin Ripley; It will ruin East and West Horsley; It will ruin Send; The A3 will not cope; Health will deteriorate; There are no jobs; The roads are country lanes; The area cannot cope with these numbers; We are a tiny rural hamlet of a few hundred people with agriculture as the main use of the land; There is no infrastructure for a new town; It is a medieval hamlet with an ancient Church All Saint’s Ockham and Grade 11 listed buildings; It is Green Belt Surrounded by conservation areas; Rare flora and fauna exist; Great crested newts, Dartford Warblers, Nightlarks, Red Kites, fungi and butterflies and snakes all rare and protected; This Plan destroys our countryside and fails to prevent town congestion. It would destroy the qualities that make Guildford and its surrounds a successful place to live and work. This plan provides too much land for development and does not do enough to ease congestion. The Green Belt needs protecting as do the Surrey Hills; Why are brown field sites not being used for development? To clear the area of derelict unsightly land and utilise it for the needs of Guildford residents; Residents will not be provided with homes they required; The proposed developers are overseas, Cayman Island Registered company. Surely this is of enormous concern to G B C, and I trust all investigations into ownership in accordance with the law have been carried out by G B C. The
character of Guildford will not be protected and improved upon. This is required in a draft Local Plan as follows, concerning Guildford

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/566  **Respondent:** 10959425 / Jan Lofthouse  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )

1. **REMOVAL OF former WISLEY AIRFIELD FROM THE GREEN BELT**
   This is farm land. Please visit. It is lush with maize. Cattle graze. People walk and cyclists and horse riders use rights of way I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

1. **INCLUSION OF FORMER WISLEY AIRFIELD**
   I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

   Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

   It is well known that the site is unsuitable for a so called new town – this is a farm, this feeds many people, it is used every day by locals and visitors as recreational space and its beauty in the summer months will be lost for ever. Its views to the Surrey Hills will be impeded. Life in Ockham and surrounding villages will not cope with 5000 extra cars on the road, 4000 extra people in a hamlet of under 400 people and under 200 homes.

   PLEASE REMOVE FORMER WISLEY AIRFIELD AS A STRATEGIC SITE NOW
   I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

   THIS SITE NEEDS PROTECTION< NEEDS TO BE IN THE GREEN BELT< NEEDS TO BE SURROUNDED WITH CONSERVATION AREAS with Dartford Warblers, Great Crested Newts, Skylars, Red Kites, rare funghi, butterflies and bees

   Please BUILD ON DERELICT UNSIGHTLY BROWN LAND and kindly leave nature to flourish in Ockham

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the G B C Draft Local Plan as it includes a Green Belt Site, Former Wisley Airfield, Now Three Farm Meadows as a strategic Site

And yet Ockham Parish Council has applied to G B C for this to be a Community Asset

There is a time scale for G B C to respond to this and the deadline has now passed last month

Therefore as it is highly likely the community will take over this asset kindly remove it from the draft Local Plan

Please do not change the status of Green Belt Sites in Guildford Borough

I object on this basis to the draft Local Plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6218  Respondent: 10959425 / Jan Lofthouse  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Green Belt land in Ockham is included as a strategic site in the G B C draft Local Plan

Its habitat includes Skylarks
Dartford Warblers
Great Crested Newts
Red Kites
Rare plants
Rare butterflies
Snakes
Badgers
Other protected species

Why do Surrey Wildlife Trust maintain the conservation areas, SNCI, SPA Thames Basin conservation areas around Ockham?

Surely this is to preserve the wild life and the green environment

Please visit now the Ockham Common, the Former Wisley Airfield, now Three Farm Meadows

It will look very different to six months ago, green and lush and full of crops and trees rare flowers and wildlife

How can you build on this?

Why are rangers protecting the sites?

We are all protecting the sites in Ockham
and surrounding villages in the green belt
And so

Why is G B C not?

I await your comments

Please remove Former Wisley Airfield (temporary in the war and promised by Government to be returned to agriculture) now Three Farm Meadows from the draft Local Plan as a strategic site and I object also to your draft Local Plan generally as it fails to preserve our green belt land

that is apart from where prominent councillors happen live, such as Ash!!! I wonder why

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/7278  Respondent: 10959425 / Jan Lofthouse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please remove Former Wisley Airfield (temporary in the war and promised by Government to be returned to agriculture) now Three Farm Meadows from the draft Local Plan as a strategic site and I object also to your draft Local Plan generally as it fails to preserve our green belt land that is apart from where prominent councillors happen live, such as Ash!!!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7644  Respondent: 10959425 / Jan Lofthouse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have seen all the documents supplied by Wisley Action Group concerning objecting to the Draft Local Plan I fully support all WAG says in Parts 1 and 2 and therefore I strongly object to the draft Local Plan just as WAG has done

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/694  Respondent: 10959425 / Jan Lofthouse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the inclusion of Garlick’s Arch Ripley as a strategic site in the draft Local G B C Plan and please remove this as a strategic site
I consider that the Green Belt in Surrey needs protecting and object too on that basis

Please remove Garlick’s Arch and other Green Belt sites in Horsley and Ripley as well as former Wisley Airfield (Three Farm Meadows) from the draft Local Plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1861  Respondent: 10959425 / Jan Lofthouse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECTION
Green Belt Ripley and Horsley Surrey – PLEASE REMOVE Garlicks Arch and other sites on green belt land from the Draft Local Plan

I object to the draft Local Plan including Green Belt areas in Ripley Surrey and Horsley as well as Former Wisley Airfield Ockham

Please remove Green Belt sites from the draft Local Plan

There is plenty of land within the Guildford Borough for development without touching Green Belt

Richard Rogers renowned Government Advisory Architect has confirmed that there is no need to touch Green Belt Land for development in England

There is plenty of derelict land to develop

Developers are sitting of enough land to meet all housing needs but land bank, for profit

Why not address this and encourage development on land held by commercial developers?

Please remove Green Belt from your draft local Plan and retain the green belt sites and ensure Surrey villages are protected from monstrous developments overwhelming the size of the villages and hamlets

Please do not change the status of Green Belt Sites in Guildford Borough

I object on this basis to the draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. RURAL VILLAGE LIFE WITH GRADE 11 LISTED and HISTORIC BUILDINGS
   I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1230  Respondent: 10959425 / Jan Lofthouse  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

NO INFRASTRUCTURE
I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1232  Respondent: 10959425 / Jan Lofthouse  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

1.  AIR QUALITY
I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

1.  RUINATION OF A LOCAL COMMUNITY
I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1400  Respondent: 10959425 / Jan Lofthouse  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Traffic in Ripley at peak hours is at a standstill. It can take forty minutes to drive through a tiny village of Ripley. Do you want Ripley to be ruined forever? Air quality there is atrocious

Please do not be remembered for making beautiful historic villages into urban sprawl.

For how long do villagers have to keep fighting? Spending vast amounts on legal and expert advice, including ecologists and air quality experts?

OCKHAM RIPLEY HORSLEY AND SEND WILL NOT GIVE UP THIS FIGHT and you will soon have R H S Wisley redevelopment and improved facilities with this charity attracting half a million more visitors per annum, in turn with an extra half a million car movements per year on the A3 in the Ockham, Ripley, Wisley, M25 Junction 10 areas, albeit not necessarily always at peak time, but for some of the time it will be rush hour, particularly exiting from R H S Wisley

With this there is no possibility of dwellings on the green belt too in this area, no room for people, cars, pollution.

We will all suffer from even poorer air quality too. There will be legal actions against G B C for personal injury. The New Mayor of London is now addressing this problem actively. G B C Please take note. 10,000 people die from poor air quality in London each year.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/16298  **Respondent:** 10959425 / Jan Lofthouse  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Green Belt land in Ockham is included as a strategic site in the G B C draft Local Plan

Its habitat includes Skylarks

Dartford Warblers

Great Crested Newts

Red Kites

Rare plants

Rare butterflies

Snakes

Badgers

Other protected species

Why do Surrey Wildlife Trust maintain the conservation areas, SNCI, SPA Thames Basin conservation areas around Ockham?

Surely this is to preserve the wild life and the green environment

Please visit now the Ockham Common, the Former Wisley Airfield, now Three Farm Meadows

It will look very different to six months ago, green and lush and full of crops and trees rare flowers and wildlife

How can you build on this?

Why are rangers protecting the sites?
We are all protecting the sites in Ockham and surrounding villages in the green belt
And so
Why is G B C not?
I await your comments

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As well as Objecting to Three Farms Meadows, Former Wisley Airfield being sited for development
I Object to Garlicks Arch Ripley being in the draft Local plan for housing
I Object to Land for new north facing slip roads to and from the A3 at Aend Marsh/Burnt Common
I Object to Land at the rear of the Talbot Pub Ripley as this is further Green Belt Development
Green Belt land MUST be protected at all cost
I Object to The Paddocks Rose Lane
as this further extends development in the Green Belt
All Land which is GREEN BELT is for common use as open spaces and it is not right to include these special areas as possible sites for planning
Kindly remove them from the Local Plan
Please use your derelict ugly sites in and around Guildford Centre to create housing jobs pleasant developments, shops and leave the Green belt alone. Rural villages should grow organically

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan as it impinges on the Green Belt and Ockham is a tiny rural historic village, yet G B C still includes former Wisley Airfield as a Strategic Site. This will engulf Ockham, cause the loss of actively farmed land, affect air quality to the detriment of all visitors and locals in the area to a dangerous level, and there is no infrastructure

The following are important key reasons:

1. LOSS OF THE GREEN BELT
   I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1398   Respondent: 10959425 / Jan Lofthouse   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please Keep our Surrey villages in the green belt as Councillors have promised us - Once our precious Green Belt is Gone it is GONE FOR GOOD

G B C has plenty of derelict sites to build on - So please use them. Make this attractive for developers. Make developers give up their land banks

As a priority protect green belt land - Richard Rogers renowned architect and Government advisor has said there is no need to build on the GREEN BELT< SO PLEASE SAVE IT

Why not build on your unsightly unused sites first and leave the Green Belt Alone?

Please protect the green belt.

Please leave countryside alone.
Please Leave GREEN BELT land alone.

Please Leave useful agricultural land alone.

Please visit the farmland in Ockham and Ripley and see the traffic at peak hours at Ripley High Street and off the A3 between Junction 10 and Ripley turn off.

Thank you, you will see how this rural community could not cope with losing green belt sites and having thousands of extra dwellings imposed.

Please do not be remembered for making beautiful historic villages into urban sprawl.

Please be remembered for conscientious thoughtful planning using unsightly sites, and leaving green belt alone.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/1231 **Respondent:** 10959425 / Jan Lofthouse **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **ECOLOGY**
   Conservation sites will be ruined

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/1227 **Respondent:** 10959425 / Jan Lofthouse **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. TINY RURAL OCKHAM

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/50</th>
<th>Respondent: 10959425 / Jan Lofthouse</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016</td>
<td>Question 7: Any other comments?</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</tbody>
</table>

I wish to see the following changes in the Local Plan:

WISLEY AIRFIELD< THREE FARM MEADOWS REMOVED AS A STRATEGIC SITE

It is simply not feasible and insufficient land is under the control of the developers/agents

There is no access from the A3 apart from for waste for S C C and certain limited traffic movements per day

There needs to be:

- A realistic housing target that focuses on the needs of Guildford and takes full account of the constraints of being a congested gap town.
- High priority given to providing attractive campus accommodation so 80-90% of university students will want to live on campus freeing up hundreds of affordable homes in the town within 5 years.
- A bus interchange which means you can travel easily in any direction from one central point without needing a car.
- Another crossing over the railway and river for our divided town and firm plans for an A3 tunnel.
- Guildford’s green setting, tree lined approaches, fine views, historic centre and riverside maintained as valued and distinctive features of the town.
- Proper account taken of the permanence of Metropolitan Green Belt as well as the protection of the Surrey Hills Area of Outstanding Natural Beauty

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/4301</th>
<th>Respondent: 10959425 / Jan Lofthouse</th>
<th>Agent:</th>
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</thead>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the continued inclusion of Three Farm Meadows, the Former Wisley Airfield as a strategic site in this Plan

I agree absolutely with the views of Ockham Parish Council above

I trust that the green belt, agricultural site will be removed from the Plan

The OPC response is attached for ease of reference and I fully concur with the objections

The Wisley site is totally unsustainable and there are no reasons for an unwanted unsuitable development there with conservations areas Special Protection Areas, Sites of Special Scientific Interest wildlife to include rare Dartford Warblers, nightingales, night jats, great crested newts, rare butterflies, 

The immediately surrounding rural villages would be ruined, that is Ockham, Ripley, Send, East and West Horsley and all neighbouring areas would be at gridlock to include Cobham, Wisley, Esher

The Guildford area has plenty of disused brown field derelict areas for housing

The housing numbers are wrong in any event.

Guildford Borough Council rejected planning permission on Three Farm Meadows Ockham – The former Wisley airfield which is a farm, on 14 planning grounds last April 2016, and so query why they continue to include this as a strategic site, in contradiction to its decision

The people of Ockham continue with the fight to stop planning development on this site with the appeal this September 2017 by overseas Cayman Islands anonymous so called developers, having had to raise almost £200,000 from a tiny village of under 200 homes and approx 400 residents and query for how long this will continue that there enjoyment of daily life is interrupted with the so called developers constantly reapplying for permission on this land, and moving the goal posts

The site needs to be recognised as it is, a green belt agricultural piece of land, being the lungs of London, enjoyed by all who work, live, walk, and spend recreation time on foot, with bicycles, horses, families

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [OPC_Response_to_Updated_Local_Plan.docx](file) (42 KB)

Comment ID: PSLPS16/3520  Respondent: 10959457 / Maria Niblett  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to building 45 houses at Clockharn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/3517  **Respondent:** 10959457 / Maria Niblett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development at Garlick’s Arch for 400 houses because it was brought to our attention at the very last moment with only 2 weeks’ notice and without any prior consultation with the residents and is not required in terms of housing need by either the village or the borough.

I object to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. Should there be a credible need for this space, it should be located at Slyfield where there is already an industrial estate and there is a 40ha site available.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/3518  **Respondent:** 10959457 / Maria Niblett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development at Garlick’s Arch because the site is covered in ancient woodland. Trees which existed in the 16th century would be endangered. Additionally this site is also at risk of flooding.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Comment ID: PSLPS16/3519  Respondent: 10959457 / Maria Niblett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be enormous congestion because Send would undoubtedly be used as a cut through to the A3/M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3521  Respondent: 10959457 / Maria Niblett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development of 40 houses at Send Hill due to the subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is totally inappropriate due to the narrow width single track country road which would afford insufficient access to the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7794  Respondent: 10959457 / Maria Niblett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the fact that infrastructure requirements have not been properly considered for the last 30 years for Send and surrounding areas. Existing roads are inadequate to deal with proposed housing levels.

It is very clear that the roads, doctors and schools will be unable to cope with the massive increases.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7789  Respondent: 10959457 / Maria Niblett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that 70% of the proposed 13,860 houses are to be built within the Green Belt land running along the A3. This will destroy the open enjoyment of the borough and produce even more accidents (currently at least one a week) on the A3 and surrounding roads including the A247 which are all already running at 200% capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7792  Respondent: 10959457 / Maria Niblett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land (which now that we are exiting the European common market, will be needed for farmers to grow crop. The traffic generated from these houses will increase massively congestion on the A3 and surrounding roads like Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of Send from the Green Belt because it helps to separate the village and surrounding countryside from Woking and Guildford dense housing.

I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances as already exist a permanent site at Slydefield which doesn’t endanger the erosion of the current Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7793  Respondent: 10959457 / Maria Niblett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the complete failure/ lack of will/enthusiasm of GBC to identify sufficient brownfield sites within the urban area which should be identified/targeted first for any development. The open countryside and the Green Belt should be looked at after the availability of brownfield sites have been exhausted. I object to the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7787  Respondent: 10959457 / Maria Niblett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to all proposals to build on the Green Belt at Send and surrounding areas because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas which are much closer to existing transport lines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/7788  **Respondent:** 10959457 / Maria Niblett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the exaggerated “housing need” figure of 13,860 which is far too high. This results in the unnecessary development of the Green Belt. The way the number of possible people coming to the area and being able to afford housing has been overestimated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** SQLP16/1153  **Respondent:** 10959457 / Maria Niblett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all the proposed sites in Send put forward by the council because they were not included in the previous consultation in 2014. Also unlike the rest of the borough, Send residents have not been properly consulted and all its sites have been changed substantially.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPA16/3987  **Respondent:** 10959681 / James Bryer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of Send from the Green Belt. The village and its countryside provides a very important and necessary definition between Woking and Guildford. Green Belt policies were introduced in 1935 for very good reasons, all of which remain important and relevant today. They were designed to prevent neighbouring towns merging into one another; to safeguard the countryside and to assist in encouraging the recycling of derelict and other urban land. All of these reasons are relevant today and any new development should be focused on the immediate Guildford area and NOT in the surrounding countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7424  Respondent: 10959681 / James Bryer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Similarly, I object to the development at Garlick’s Arch for 400 houses. The late introduction of this site into the Local Plan, without any prior consultation, is solely due to the availability of private funding for the proposed new interchange proposal at Burnt Common in conjunction with the Wisley development. It would never be considered for development on its own merit due to its ancient woodland and its susceptibility to flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7422  Respondent: 10959681 / James Bryer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
• I object to the proposed new interchange onto the A3 at Burnt Common. This will seriously impact on many beautiful homes and an area of significant wildlife. If there is a need for an on/off interchange this should be by an upgrade and improvement of the Ripley Wisley interchange where there is already 50% of the required infrastructure and away from any existing housing. The A247 is unsuitable for increased traffic passage through to Woking (especially given the narrow roads through Old Woking via low lying flood prone land). It is also an important route for cycling and the proposals have not considered there health and issues connected with this growing and important national sport and pastime.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7423  Respondent: 10959681 / James Bryer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site. Surely these could be accommodated at the Wisley development with closer access to the M25 and on a green field site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1832  Respondent: 10959681 / James Bryer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I really do object to all the proposed sites in Send as they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially. The semi rural nature of the village would be damaged irreparably.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As residents of East Horsley, we are writing to express our objections to the new housing proposals contained within the new local plan. The extension of the boundaries of the village, and the consequent removal of areas from within the Green Belt and erection of over 500 houses, will destroy the village and turn it into little more than a suburb of Guildford. The village simply does not have the infrastructure to cope with a massive increase in its population and we fail to see how the plans address this. The roads are narrow and ill maintained as it is. The village cannot support additional road traffic and parking (including station parking for many more commuters). Persistent rain, which occurs regularly, floods the centre of the village all too easily, as well as the road we live in.

The above comments relating to the village of East Horsley can be applied equally to the development of 2,000 houses on Wisley airfield, also included in the plan. You have only to try to join the queue onto the A3 at Wisley any weekday morning to see how unrealistic such a proposal is.

We do not believe the plan takes adequate account of local needs and the requirement for suitable infrastructure investment before any such development is considered, and the proposals tabled will serve only to destroy the precious atmosphere and life of one of Surrey’s finest villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick's Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D).

The "objectively assessed need" figure of 693 homes a year is too high. A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects. The current SHMA inflates the proposed housing figure due to failure to correct for errors in the historical data for international migration flows, issues with the way it considers students and affordability and flaws in the method for estimating the number of homes needed to support job growth. It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough; it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham's sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England's requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an "aspiration" in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I OBJECT to the inclusion of the land at Garlick's Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8).

There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brownfield site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick's Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council's own Green Belt & Countryside Report does not address Garlick's Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy 13).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy 03).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site (Policy 14).

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy 11)

Furthermore, several electricity pylons run through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of 'through' traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3**

**Comment ID:** PSLPP16/10484  **Respondent:** 10960033 / Lucinda Kalupka  **Agent:**

1. I OBJECT to the damage to the historic environment as a result of the scale of the proposed development {Policy D3}

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick's Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1**

**Comment ID:** PSLPP16/10480  **Respondent:** 10960033 / Lucinda Kalupka  **Agent:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick's Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (Blc), general industrial (B2) and storage and distribution (B8) at Garlick's Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick's Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10482  Respondent: 10960033 / Lucinda Kalupka  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the location for new employment floorspace at Garlick's Arch - Site A43 (Policy E2)

Proposals for new industrial, warehouse and storage (use Class Blc, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick's Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10483  Respondent: 10960033 / Lucinda Kalupka  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the loss of rural employment (Policy E5)

Policy ES supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick's Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10498  Respondent: 10960033 / Lucinda Kalupka  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor "attractions" and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/"Disneyfication". Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many "leisure and visitor attractions" already. The case for creating more is not made and no examples are given. Instead, the plan's explicit priorities should be:

1. To protect the borough's prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

   1. To help make Guildford's river landscape less off-putting and support town-break packages for high-value. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

   2. To help private providers market local. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An "English town break" (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a South West Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.
3. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/10495</th>
<th>Respondent: 10960033 / Lucinda Kalupka</th>
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1. I OBJECT (POLICY H1- Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. POLICY H3 - Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the "mix" this can include "market" housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances ."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10487  Respondent: 10960033 / Lucinda Kalupka  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.
The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

1. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick's Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents' in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. **I OBJECT to poor air quality concerns (Policy I3)**

Paragraph 4.6.27 of the Plan states that "Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health." The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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1. **I OBJECT to not protecting the Green Belt (Policy P2)**

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages {as mere housing need does not constitute a 'specialcircumstance' and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no
evidence base to support including this site. Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10479  Respondent: 10960033 / Lucinda Kalupka  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding.

Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/10469  Respondent: 10960033 / Lucinda Kalupka  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed development s do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result. Please find below photos of recent congestion in the village of West Clandon on The Street - leading to accidents and possible injury to pedestrians and school children on the narrow pavements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 2.JPG (100 KB)
1.JPG (124 KB)

Comment ID: PSLPP16/10474 Respondent: 10960033 / Lucinda Kalupka Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and this approach differs from all the other Borough Councils in Surrey.

1. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite

1. The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or on any common sense view, "West Surrey" is
much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification on to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clendon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I write with reference to the draft local plan and its impact on the Green belt and in particular the villages of Ripley and Send. I am a resident in Send Marsh and moved to this area three years ago specifically because it was in the green belt and therefore should be protected from over development. Whilst I can understand the need for some expansion in the housing stock and I am encouraged by the number of brownfield sites in the local plan, the proposed 400 houses and 7000 sq m of industrial units and warehousing at Garlick’ Arch, Burnt Common on green belt land is completely over the top. It is not in keeping with the housing density of the surrounding area and there are no plans to increase any services to support the potential 800 people and their children that could live there. The road network around Ripley and Send cannot support the extra traffic that this number of properties would generate. There are already long queues through all the villages at rush hour with the current population.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<thead>
<tr>
<th>Comment ID: PSLPS16/6630</th>
<th>Respondent: 10960257 / Craig Church</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

The proposed A3 slip road access at Burnt Common will do little to reduce this traffic as people will not want to join the A3 at Burnt Common to head north as there is always a queue caused by the M25 junction, instead they will travel along the Portsmouth road through Ripley village to jump the queue as so many drivers do now when there is heavy traffic.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<th>Comment ID: PSLPP16/13884</th>
<th>Respondent: 10960257 / Craig Church</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
In short, I object to any green belt land being used for development and in particular the villages of Ripley, Send and Clandon being inset from the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/13883  **Respondent:** 10960257 / Craig Church  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As the majority of Guildford borough is within the green belt, are the Governments figures for the number of houses that are required to be built reduced?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/4540  **Respondent:** 10960353 / Trish White  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/6488  **Respondent:** 10960353 / Trish White  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to site A25 Gosden Hill Farm - massive overdevelopment of 2000 homes in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6489  Respondent: 10960353 / Trish White  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A35 Wisley Airfield - totally unsustainable development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6482  Respondent: 10960353 / Trish White  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A43 Garlicks Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site 43a the on and off ramp at Clandon as this will increase traffic problems in the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6486  Respondent: 10960353 / Trish White  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A45 The Talbot as this is overdevelopment in a conservation area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6487  Respondent: 10960353 / Trish White  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A57 The Paddocks - 4 traveller pitches - this is unlawful.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13540  Respondent: 10960353 / Trish White  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to the lack of immediate provision for new schools and Doctors Surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13537  Respondent: 10960353 / Trish White  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to all erosion of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13538  Respondent: 10960353 / Trish White  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to any in-setting of any villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13536  Respondent: 10960353 / Trish White  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
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<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>()</td>
<td>I object to the local plan as the development proposed is not sustainable.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>()</td>
<td>Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td>Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings</td>
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<tr>
<td>Attached documents:</td>
<td></td>
<td>I object to the draft Local Plan for the following key reasons:</td>
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</table>
I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

- The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
- The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
- The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
- The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
- The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
- The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
- The fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- The fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- The fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the...
countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPI) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:  PSLPA16/3115  Respondent:  10961921 / Mark Johnson  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to allow building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and development requirements can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs. The Green Belt is meant to be permanent. The impact of significant increases in traffic through Send’s relatively narrow streets caused by this level of new development would be very serious, with the potential to cause daily traffic problems and safety issues where narrow lanes join the main A247 road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:  PSLPS16/6232  Respondent:  10961921 / Mark Johnson  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposed new interchange onto the A3 at Burnt Common because of the dramatic increase in traffic that would accompany it along the A247 as traffic cut-through to the A3/M25. The impact of significant increases in traffic on the main A247 road would be very serious, with the potential to cause daily traffic problems.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12867  Respondent: 10961921 / Mark Johnson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford. Failure to maintain this buffer would result in development that erodes the individual character of Send village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12868  Respondent: 10961921 / Mark Johnson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4429  Respondent: 10962657 / Amanda Leader  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25
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<tbody>
<tr>
<td>1.</td>
<td>I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.</td>
</tr>
<tr>
<td>2.</td>
<td>There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.</td>
</tr>
<tr>
<td>3.</td>
<td>Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt.</td>
</tr>
<tr>
<td>4.</td>
<td>The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity</td>
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<td>5.</td>
<td>The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.</td>
</tr>
<tr>
<td>6.</td>
<td>The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.</td>
</tr>
<tr>
<td>7.</td>
<td>I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).</td>
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<tr>
<td>8.</td>
<td>The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.</td>
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<td>9.</td>
<td>A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.</td>
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</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4431  Respondent: 10962657 / Amanda Leader  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43  

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<tbody>
<tr>
<td>1.</td>
<td>I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches</td>
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<tr>
<td>2.</td>
<td>It ignores all the thousands of previous objections made by local people</td>
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<tr>
<td>3.</td>
<td>There is no proven demand for travelling show people plots in this location</td>
</tr>
<tr>
<td>4.</td>
<td>There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.</td>
</tr>
</tbody>
</table>
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.

6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.

7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.
18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4432  Respondent: 10962657 / Amanda Leader  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site

2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.

3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2857    Respondent: 10962657 / Amanda Leader    Agent:
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2949  Respondent: 10962689 / Martin Ladd  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6021  Respondent: 10962689 / Martin Ladd  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A25
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 – 2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital  Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).
The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council’s eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.
Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12284  Respondent: 10962689 / Martin Ladd  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12291  Respondent: 10962689 / Martin Ladd  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12292  Respondent: 10962689 / Martin Ladd  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

I OBJECT to Policy D4 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12281  Respondent: 10962689 / Martin Ladd  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/12282  Respondent: 10962689 / Martin Ladd  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12283  Respondent: 10962689 / Martin Ladd  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12294  Respondent: 10962689 / Martin Ladd  Agent:
I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/”Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12288  Respondent: 10962689 / Martin Ladd  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.
I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12289  Respondent: 10962689 / Martin Ladd  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.
I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations Ire available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 10962689 / Martin Ladd</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment.
without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

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I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

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I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent:</th>
<th>10962689 / Martin Ladd</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.
I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the "insetting" of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the "openness" of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To "inset" two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed "insetting" and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12280   Respondent: 10962689 / Martin Ladd   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12277  Respondent: 10962689 / Martin Ladd  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.
Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible
change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent:  10962689 / Martin Ladd</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate?  ( ), is Sound?  ( ), is Legally Compliant?  ( )

Answer (if comment is on questions 1-7 of the questionnaire):  ( )
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4449  Respondent: 10962689 / Martin Ladd  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.  
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.  
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,  
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of
development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjuction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to, capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are
already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4451  Respondent: 10962689 / Martin Ladd  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp171/2878  Respondent: 10962689 / Martin Ladd  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6760  Respondent: 10962785 / Derek Gilmore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.
It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.
The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).
The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14401 Respondent: 10962785 / Derek Gilmore Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document? Attached documents:

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<th>Comment ID: PSLPP16/14415</th>
<th>Respondent: 10962785 / Derek Gilmore</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document? Attached documents:

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<th>Comment ID: PSLPP16/14395</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/14397  **Respondent:** 10962785 / Derek Gilmore  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.
Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14399  Respondent: 10962785 / Derek Gilmore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14417  Respondent: 10962785 / Derek Gilmore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is
likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

- To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
- To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
- To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.
- To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14413  Respondent: 10962785 / Derek Gilmore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.
There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university’s ability to house its own students and reduce the housing number accordingly.
Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14412  Respondent: 10962785 / Derek Gilmore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14416  Respondent: 10962785 / Derek Gilmore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being “closely related”. In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1).

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.
Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14406  Respondent: 10962785 / Derek Gilmore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14408  Respondent: 10962785 / Derek Gilmore  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14391  Respondent: 10962785 / Derek Gilmore  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The
fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.
There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14419  Respondent: 10962785 / Derek Gilmore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

• I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

• The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

• Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

• Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it
cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14393   Respondent: 10962785 / Derek Gilmore   Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14389   Respondent: 10962785 / Derek Gilmore   Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. However the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build on 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a
“plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1670  Respondent: 10962785 / Derek Gilmore  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan on which it is claimed to be based.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1671  Respondent: 10962785 / Derek Gilmore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

• “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
• The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
• The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
• The draft Plan does not accord with the NPPF policies on protecting the Green Belt.
• Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites-which amount to 65% of the proposed housing number.
• Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
• The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
• Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
• The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.
• GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
• GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
• GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
• Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
• Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
• The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
• The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
• The proposal for Garlick's Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
• The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
• No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
• In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
• The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
• Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
• Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
• The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I strongly object to the lack of evidence for the alleged housing need numbers. There has repeatedly been a failing to provide this evidence.</td>
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<td>I strongly object to the local plan on the grounds that it will diminish the pride of a longstanding community in our shared environment, a natural environment that will be significantly reduced by the development put forward in the local plan. What changes (2016)/further amendments (2017) do you suggest should be made to the document? Attached documents:</td>
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<td>I strongly object to the destruction of historical the villages that this development will encourage. This will destroy character and heritage of these villages through over development and overcrowding. What changes (2016)/further amendments (2017) do you suggest should be made to the document? Attached documents:</td>
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<td>I strongly object to the local plan on the grounds that these developments are out of character with the current residential areas of Ripley, Send and Clandon. I strongly object to the local plan on the grounds that it will destroy several landscapes of beauty for current residents and visitors as well as future generations. This will negatively impact the enjoyment of this area. What changes (2016)/further amendments (2017) do you suggest should be made to the document? Attached documents:</td>
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</table>
I strongly object to the Guildford local plan on the grounds that it will put severe pressure on the local infrastructure of waste disposal – especially the sewage works – infrastructure that has not been designed to withstand such great increases in population. Expansion of this infrastructure will result in further problems and inconveniences for the local residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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I strongly object to the local plan on the grounds that it will destroy several recreational spaces. These spaces are currently used for exercise, dog walking, rambling, and horse-riding, but will be inaccessible following the development proposed by the local plan.

I strongly object to the local plan on the grounds that the increase in housing and related increase in residents will result in a great increase in traffic. This will greatly increase the commuting journey of many as well as significantly increasing the length of the school run.

I strongly object to the local plan on the grounds that the resultant increase in traffic will impact negatively on road safety and will result in more collisions on the road. This road network struggles to cope with current levels of traffic now and the proposed plans for an A3 ramp at Burnt Common will not alleviate traffic in Ripley, Send or Clandon.

I strongly object to the local plan on the grounds that the reduction in recreational spaces will have negative impacts on young people especially and reduces the space available for sport and exercise.

I strongly object to the local plan on the grounds that it will result in a greater demand on school places in under fives, primary and secondary. This will make it much harder for parents to send their child to their first choice school and therefore more difficult for parents to ensure their child’s needs are catered for.

I strongly object to the local plan on the grounds that this development will result in over crowding in schools and a demand for more school building at a time when school finances have been cut and schools therefore cannot afford this kind of expansion.

I strongly object to the local plan on the grounds that the plans for development are of poor quality and layout – the layout plans are unsustainable in the long-term and poorly thought through.
I strongly object to the local plan on the grounds that the plans show a lack of planning for pedestrian footpath and therefore the plan is both inconvenient and dangerous for pedestrians. This is especially important in an area where there is a significant elderly population who are unable to drive (see Ripley Good Neighbours).

I strongly object to the local plan on the grounds that the plan shows an overdevelopment of sites that is both unnatural and unsightly. The plans show developments that are concentrated and cramped.

I strongly object to the local plan on the grounds that local restaurants and shops will be completely overwhelmed and will be unable to cater for the increased demand resulting from these developments. The local plan shows very little consideration for this.

I strongly object to the local plan on the grounds that the welfare facilities of these areas in the plan will be totally overcome by the increased demand and will disserve both current residents and those who would live in the developments proposed in the plan. There is very little room to expand these facilities and little mention of this in the plan.

I strongly object to the local plan on the grounds that the current policing of the area would not be able to cope with the increased population of these proposed areas and at a time when funding has been reduced, would be unable to provide an acceptable service. This would be extremely problematic and potentially dangerous for the local residents of Clandon, Ripley and Send.

I strongly object to the local plan on the grounds that the local health care service would be unable to cope with this proposed increase in population and, similarly, at a time when funding has been reduced, would be unable to provide an acceptable service. The Send Villages Medical Centre is already overloaded with patients and lack staff and space to cater for even more patients.

I strongly object to the local plan on the grounds that parking in these villages and the surrounding areas is limited and is already very difficult. An associated increase in population as proposed in the local plan will only increase these difficulties. Ripley, Send and Clandon suffer from a lack of parking and the increases in population of these areas associated with the development plans will only worsen this problem.

Lastly I wish to strongly object specifically from the perspective of a 23 year old - whilst I understand the important need for more housing across the country I wish to make clear how important this space is to me, and many of my age group. The beautiful yet unembellished nature of this space just outside of London is unique. I hope, like many, to be able to enjoy this space and appreciate what these historic villages have to offer for the rest of my life.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I strongly object to the Guildford local plan on the grounds that it fails to address environmental concerns relating to ecological health— the green belt was created as part of a nationwide ecological network providing breathing spaces for nature as well as people – this important network will be fractured by this development.

I strongly object to the local plan on the grounds that the over development of this area will significantly increase air pollution from the increased vehicles on the roads which will have detrimental impacts on human health in the area. The greenbelt provides a natural mechanism to mitigate the damage caused by carbon emissions in London. The destruction of the greenbelt in this way will destroy this mechanism.

I strongly object to the local plan on the grounds that the over development of this area will significantly increase noise pollution from the increased vehicles on the roads and housing.

I strongly object to the local plan on the ground that the over development of this green belt area will destroy valuable habitats and resources for important species – e.g. the red kite often seen flying over Ripley Green and Barn Owls seen across these areas, to name a few.

I strongly object to the local plan on the grounds of mental health. I believe that the green belt provides an important space for people from the city as well as local people to appreciate the beauty of the landscape as well as providing a space to heal. The links between open rural landscape and mental health have been well documented.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/262  Respondent: 10963137 / Gabrielle Erhardt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the local plan on the grounds that it will result in a loss of ancient woodland (at Garlicks Arch site) and will therefore result in the loss of native shrubs, rare invertebrates, fungi and many others. Ultimately this will result in the decline in diversity of the local environment.

I strongly object to the local plan on the grounds that this development will result in the destruction of hedgerows, which provide very important habitats for the local wildlife.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/265  Respondent: 10963137 / Gabrielle Erhardt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4
I strongly object to the local plan on the grounds that this development will result in the destruction of hedgerows, which provide very important habitats for the local wildlife.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I strongly object to the local plan on the grounds that it will destroy several recreational spaces. These spaces are currently used for exercise, dog walking, rambling, and horse-riding, but will be inaccessible following the development proposed by the local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I strongly object to this destruction of the Green Belt, an area of land protected to safeguard the countryside.

Subject: I OBJECT TO THE 2016 DRAFT LOCAL PLAN

I am writing to inform you of my many objections to the Guildford Local Plan.
I strongly object to the extraction of Ripley, Send and Clandon from the greenbelt and wish to firmly oppose this. The greenbelt was created to protect the unrestricted sprawl of large built up areas and I believe that the removal of these villages from the greenbelt would serve to encourage this sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/264  Respondent:  10963137 / Gabrielle Erhardt  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? , is Sound? , is Legally Compliant? 

Answer (if comment is on questions 1-7 of the questionnaire): 

I strongly object to the local plan on the grounds that increased development will result in the destruction of natural drainage, resulting in increased run-off over developed areas which will exacerbate flooding in these areas. Flooding is already a problem and to increase the occurrence and severity of flooding in these areas would be immoral.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp172/2741  Respondent:  10963137 / Gabrielle Erhardt  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? , is Sound? , is Legally Compliant? 

Answer (if comment is on questions 1-7 of the questionnaire): 

I am writing to object to the inclusion of policy A35, Three Farms meadows in the draft local plan.

1. I object to the fact that despite 1000s of objections from the local residents, this site is still included in the local plan. This is anti democratic and is wasting tax payers money.
2. I object that the plan has been extended by one year without full explanation or justification.
3. I object to the plans to provide public transport [illegible word] services to Horsley due to the negative impact that this will have on the road network. The roads are NOT wide enough and this has not been taken in to account.
4. I object that there is not sustainable employment on site and therefore there will be a significant increase in traffic on already congested roads.
5. I object to the site due to its position adjacent to the most congested road network in the country (J10). This is absurd.
6. I object to the lack of consideration paid towards the significant increases in traffic during RHS events – the proposed housing and associated congestion will make like miserable and impossible in the area.
7. I object to the changed “opportunities” listed that show why this site is completely inappropriate.
8. I object in the change of green belt boundary to the east – this now includes an area of high archaeological impact.
9. I object to the inclusion of A35 due to the constraints in the provision of sewerage capacity.
10. I object to the disregard of increases air pollution and nitrogen deposition.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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</table>

I object: The increase in housing numbers from 45 to 60 at Site A42 Tannery Lane, Send is inappropriate for an already struggling road network system. If you lived in these areas you would know that the roads are already heavily congested, especially in Ripley. The proposed development will make it a nightmare for the local residents, increase noise pollution and air pollution. I choose to live in a RURAL GREENBELT area for a reason - this development will destroy this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/15</th>
<th>Respondent:</th>
<th>10963137 / Gabrielle Erhardt</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
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I am emailing to register my STRONG objections to the new proposed local Guildford Plan.

I object: Firstly, the proposed development at Garlicks Arch, site A43 is on green belt land - this land is protected and should NOT be built on. There is no need for this communicated by the Local Plan documentation.

I object: The potential increase from 400 houses at site A43 Garlicks Arch will be harmful to the rural nature of the villages of Ripley and Send. These are small rural villages that will be destroyed with this level of development. Please listen to its inhabitants!!!! This increase is not justified by the local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object: The allocation of 6 travelling Showpeople plots with storage facilities is completely inappropriate for the rural area. Associated traffic will also be a great problem.

I object: Whilst the Plan (Section 4.2.22) states that there are sufficient sites for 8 plots for Travelling Showpeople - why do 6 of them have to be in Ripley???? This is unfair and badly planned.

I object: The plan is inconsistent in regards to the travelling Showpeople plots - according to the 2017 plan, these plots are also designated as housing. This plan is poorly thought out and is inconsistent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object: The removal of site A46 for the Plan has left the plan even further unbalanced - over 40% of the proposed development is planned in the North East of the Borough. This is unfair and will disproportionately impact the Ripley area. The Ripley area has already experienced a great increase in housing and residents through infill and does not need to shoulder the majority of development in the Guildford Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object: In terms of waste infrastructure, the Waste Management Facility at site A58 is briefly mentioned in policy 4.423a - but this does not show any evidence or any future plans to investigate this site. This plan is poorly thought through and detrimental to those living in this area.

I object: The potential for substantial increase in industrial floorspace from 7000sq m to an unknown amount at site A58 Burnt Common is very unclear and ambiguous. How are we as local residents to object to such a vague plan?? This is unfair and poor practice.

Lastly I would like to object to the lack of consideration given to the 32,500 responses to Guildford's last disastrous plan.
We live in a democracy and demand to be heard. This new plan reveals the undemocratic nature of Guildford Borough Council and suggests that there is corruption and ignorance at the heart of this council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I support the Guildford Residents Association (GRA) response and oppose Guildford expanding by a quarter. I am appalled that any Local Council can produce a draft plan that is so flawed. You have just lost my vote as I will feel I can never trust you again.

Flawed evidence is exaggerating the need for expansion as shown clearly by the GRA report on housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Transport evidence is not yet fit for use and major transport issues are unresolved eg another river crossing, a central bus facility.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Please come to your senses, stop letting Development Companies ruin our home environment. Stand up to them and for your constituents and stop wasting our money on these flawed reports.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Allowing Green Belt development to pay for transport schemes will simply generate yet more traffic from more homes, fuelling congestion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17755  Respondent: 10963233 / Susan Poole  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

You oppose unjustified Green Belt development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17751  Respondent: 10963233 / Susan Poole  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Expansion should be constrained to protect the character of town and country in our congested gap town.

It is unacceptable that, unlike other places, Guildford is choosing not to constrain its overall housing growth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is irresponsible to squander every last resort greenfield site in a single Plan, robbing future generations.

Brownfield opportunities are being ignored – we need homes in the centre (not 40% more shops), much more accommodation on campus for students, and homes for the elderly to free up family houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/2038  Respondent: 10963233 / Susan Poole  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan is not ready for an inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2981  Respondent: 10963969 / David Griffin  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We would wish to make the following comments in respect of the plan.

The road network is already very busy with the main road through the Horsleys being very narrow. To allow so many new houses in the area will vastly increase traffic and make the roads dangerous and very congested.

The railway car park in Horsley is full during the week. To allow more housing and cars would make this situation unviable and create considerable extra pollution.

The doctors surgery and schools are full to capacity and we cannot cope with any greater population in the area.

The parking in Horsley centre is limited and additional housing would make it very difficult to use the local shops.

I would urge that the Horsleys are NOT taken out of the green belt for the reasons detailed above and the plan makes provision for no or very limited further housing. The proposals for such a large expansion of housing and population cannot be catered for with the current infrastructure we have, which can barely cope with the current situation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I wish to strongly object to the above proposed development as it breaches rules, will have major adverse impacts on the natural environment including wildlife, local traffic and infrastructure as well as resulting in a development which is total out of character with surrounding settlements and lacking in the fundamental tenets of sustainability. The housing density of the proposed new development would be roughly 6 times as dense as the existing local settlements.

The site falls within the Metropolitan Green Belt and, as such, should only be developed if the proposal meets “very special circumstances”. The proposal singularly fails to demonstrate that the benefits of the development outweigh the harm to the Green Belt and other aspects noted above. The development would create the largest settlement in Guildford Borough after Guildford itself, and be the inevitable precursor to further development of the Green Belt and spread of suburban London outside of the M25.

The local roads in the Horsleys area are basically narrow, winding country lanes, already busy at peak times and will not be able to cope with the additional high volumes of traffic the development would create. The lack of suitable infrastructure in the proposed development will make the car the first choice of transport – probably another 4000+ cars and associated journeys - adding to the already serious traffic queues experienced around the M25/M3 junction, of existing concern already to Highways England. The local rail stations at Effingham Junction and East Horsley do not have sufficient parking to accommodate the extra cars and cars are already now parking on Effingham Common Road as the station car park is regularly full.

Both Ockham & Wisley Commons lie within an area designated as a Site of Special Scientific Importance (‘SSSI’) and forms one part of the Thames Basin Heaths Special Protection Area. A large percentage of the site lies within the 400m Exclusion Zone where new building is effectively prohibited. The impact of such a large settlement and associated pets will inevitably have a detrimental impact on the local wildlife.

**GBC Local Plan**

Noting that the proposed Wisley Airfield development constitutes a fundamental part, I wish to object to the overall proposed Submission Local Plan.

Many of the comments above, particularly those relating to moving the boundaries of the Green Belt, the significant impact of increased traffic on already busy narrow local roads, lack of sustainability and inadequate proposed improvements to local infrastructure apply more generally to the development proposals contained in the document. The proposed developments are out of character with the village nature of the Horsleys and, particularly, the density of the new housing will contrast starkly with the existing settlements.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- Disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- Directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- Ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- Adds to air pollution in neighbouring areas, which already exceeds safe EU limits.
- Further residential houses in this area will continue to swell the already overloaded peak time traffic on many major roads in the area.
- Trains to London from Guildford station are already very over-crowded as peak-time, many times you cannot even get onto the train service never mind trying to get a seat. More people living in the area and using these facilities will further compound the problem.
- Public facilities such as schools & leisure centres are currently very busy and over-crowded, significant population rises in the local area will create an overwhelming burden on their resources & facilities.

I cannot emphasise enough the traffic problem that already exists around Guildford in general, many locals have to spend hours stuck in this traffic whilst they attempt to go about their daily lives.

In my opinion, there should be no further significant increase in housing in the area until all roads are upgraded to cope with the existing levels of traffic and then a sound-plan put in place and delivered in order to cope with the expected increase in traffic. This must be Prior-To building any significant further housing, not agreed to on a promise with a developer and then not delivered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2238  Respondent: 10964705 / Sarah McGraw  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to formally object to the Local Plan for Send because of a number of very important reasons.

Firstly, there is simply not the local infrastructure to support building 400 houses at Garlick's Arch. The impact on traffic flow as well as local services (GP surgery, schools) is very significant and does not appear to have been considered.

Secondly I am quite frankly terribly disappointed to hear that all of a sudden Send village has been taken out of the Green Belt. There are no valid reasons why this has happened and it appears to have been done in a very underhand way.
Thirdly, I object to the proposed interchange with the A3 at Burnt Common. As a local resident (I live on Burnt Common Close) I cannot see how Send village would be able to cope with all the increased vehicles. The traffic lights in Send would be overwhelmed and the roundabout at Burnt Common would be near to gridlock at rush hour.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/5665  Respondent: 10965473 / Stephen Swain  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed additional housing outlined in the Local Plan for the following reasons:

- The area along the bottom of the Hogs Back behind the University land is Green Belt land of considerable quality and should not be built on. If this development goes ahead it is likely to set a precedent for more development in the future, almost certainly resulting in an urban sprawl from Guilford to Ash and eventually to Aldershot. A whole swathe of high quality countryside, with all the associated wildlife habitats, will then be lost forever with a detrimental impact on all the communities in the area.
- The current infrastructure of the area is totally inadequate to cope with potential increase of upwards of 1000+ vehicle movements a day on an already overloaded road, bus and rail system. The A3 is regularly congested at peak times, as is the Aldershot and Worplesdon Roads. A major new road network will be necessary to connect such a development into the existing road system with the resultant loss of more valuable land.
- Any identified housing requirements in the Guildford area should located on existing brownfield sites in the first instance, where connectivity to local services is already in place. Only once such sites have been utilised should any additional land around the town be considered. To my knowledge there has never been any serious consultation with the local population to explain and try to justify why the area suddenly requires nearly 700 houses, and if there is a requirement why they should be provided in one vast estate.
- A development of this size will require a new water and sewerage system to cope with all the properties, as the local system will not be able to cope, again requiring additional land for these facilities.

To summarise, this proposed development appears to have no justification, is in the wrong place, would ruin the local countryside, and have a negative impact on all the communities of the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1853  Respondent: 10965633 / Charlotte Taylor-P  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed additional housing outlined in the Local Plan for the following reasons:

- The area along the bottom of the Hogs Back behind the University land is Green Belt land of considerable quality and should not be built on. If this development goes ahead it is likely to set a precedent for more development in the future, almost certainly resulting in an urban sprawl from Guilford to Ash and eventually to Aldershot. A whole swathe of high quality countryside, with all the associated wildlife habitats, will then be lost forever with a detrimental impact on all the communities in the area.
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To summarise, this proposed development appears to have no justification, is in the wrong place, would ruin the local countryside, and have a negative impact on all the communities of the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) -

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I am writing to object to the draft Local Plan for the following key reasons:

• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
• I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU permitted level. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

  ◦ I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Officers, who cited the same grave concerns highlighted in this letter.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2999  Respondent: 10965697 / Maria Angel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Co-operate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

May I please ask you to consider the points below in terms of the unsuitability of using the above land for a proposed development of 1100 homes, shops, a secondary school within the heart of Normandy village, that will create a village within a village.

On various points I strongly object to the unsustainable development of this Green Belt land on the basis that it directly impinges on the quality of life for all the community that lives within Normandy. I am based at home most of my day and the quality of my family's life will be severely impacted by the development on the basis of the following points.

Normandy as a village and parish holds great historical significance in terms of its ancient coves and the two 16th century houses that directly back on to the development. Normandy has always been appreciated not only as the 'lungs of Guildford' west of the town, but such an unsubstantiated increase in the number of homes by 1100 dwellings is a figure that has not does not directly look at the needs of Normandy Parish residents and cannot be considered sustainable.

The sensitivity test has not been fully examined in terms of the impact this erosion of the Green Belt will have in extinguishing the rural community enjoyed by those that exist within Normandy and Flexford. It cannot be underestimated the destruction of a rural environment placing this development so centrally within Normandy and Flexford. I have personally witnessed wild and domesticated animals killed on the Glaziers Lane road having been caught under the wheels of cars, where the hedgerows adjacent to my property having been removed have disturbed the wildlife. To place such unsubstantiated and disproportionate development within the open field aspect that I presently enjoy and for Normandy to
preserve its rural community environment, will have a destructive and devastating impact on the wildlife and by residents travelling by foot along the Glaziers Lane road, including Normandy's wildlife group, our district bridleways association and the many of us who walk the ancient footpath that exists on that site from Westwood Lane across to Glaziers Lane.

The number of dwellings proposed in the development cannot be proven to be sustainable and is developer led rather than examining the needs of its existing residents. Surrey Community Action undertook a housing needs survey in 2008 and at no point did it highlight the need for quantity of housing proposed that is so disproportionate and unsustainable in the extreme.

The two lanes of Glaziers Lane and Westwood Lane that are to service this 1100 home development, 6 pitches, community centre, shopping area, secondary school and playground, cannot sustain this level of traffic and can only compound the traffic congestion that feeds through the single-lane railway bridge and the junctions on to the A323 at Glaziers Lane and Westwood Lane. With the emerging development within Ash, to attempt to converge this extra amount of traffic would be practically impossible, where the A323 and Hogs Back arterial routes would remain permanently congested.

In terms of demand for a secondary school, there is no legal evidence in this development case to support the need for one on the basis of Normandy Parish's existing need. Ash Manor and Kings College secondary schools are undersubscribed and there is not the 'exceptional circumstances' to remove the proposed land from the Metropolitan Green Belt. As a youth club organiser for over 8 years, I understand the level of youth demand within the area of Normandy and Flexford and see no substantiated need for a secondary school to be part of this development.

There is severe flooding issues on the natural flood plain that is situated in the field site that sits directly opposite to my home next to the Glasford Stream culvert and bridge. A local water authority officer advised that historically the field on the other side of the road was a water pumping station where the ground held the water as a natural reservoir. This water was pumped out by a neighbouring pumping station situated adjacent to the proposed site. Hence during heavy rainfall or flash floods, the field not only floods to the point of being very difficult and unsafe to walk on, but the water drain in the Glaziers Lane road is unable to manage the quantity of water and overspills in to the road, causing a serious highways road safety problems. This area of consideration is a natural flood plain that then drains in to the Glasford Stream. Photographic evidence is available of the level of flooding in the field and the detrimental impact to safety of road users.

Please consider the points that have been made above and I ask for you to consider also for more homes to be developed on brownfield sites as a first priority where empty office space should be re-developed for homes.

I declare that I am an Independent Member of the Corporate Governance & Standards Committee and have appropriately followed the Monitoring Officer's advice in confirming my position within Guildford Borough Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6690  Respondent:  10965953 / Mark Thompson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
we object to the development of over 2,000 houses at Ockham. Aside from the obvious impact on the Horsley train station and roads the air quality at this busy M25/ A3 junction must be assessed prior to any possible plans being implemented or adopted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14048  Respondent: 10965953 / Mark Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

we object to Station Parade being designated a District Centre as this classification does not accurately reflect the nature of the village facilities and will target this area for future urban developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14046  Respondent: 10965953 / Mark Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

our infrastructure is already fully stretched at EH medical centre & Horsley station car park, & schools are full to capacity. Roads are narrow & cannot take further traffic, also affects the ability to use narrow pavement. East Horsley is currently used as a cut-through from Dorking via Green Dene/A246 to Jct 10 on the M25. East Horsley is already becoming more congested on our narrow roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14045  Respondent: 10965953 / Mark Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to the proposal to remove East Horsley from the green belt & do not feel that the "exceptional circumstances" have been fully demonstrated.

-we object to the extension of the settlement boundaries since no valid reasons have been given for this and it appears the aim is to simply increase the land available for future additional development

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14047  Respondent: 10965953 / Mark Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

we object to the increase in housing numbers which is way beyond the current & past population growth patterns & the SHMA is not revealed in the plan. An increase in West Horsley housing by 35% is greater than in any other single area in the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14049  Respondent: 10965953 / Mark Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
we object to the plan's proposal of 593 new houses in the Horsleys within 5 years of adopting the plan since this is a 25% increase to the total existing housing in the Horsleys.

We hope the Horsleys and surrounding areas can continue with an organic increase in new housing numbers that truly reflects the services and amenities available to all existing and future residents and provides a healthy environment for generations to come.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to object to several parts of The Local Plan for development within the West and East Horsleys. I am aware of
the need for new and particularly for affordable new housing in Guildford and the need therefore for all areas in the
borough to accept some expansion. I believe, however that the proposals as they affect West Horsley are excessive and do
not adequately address important infrastructure constraints nor are they in keeping with the needs, character and
environment of the village:

- Water and Drainage: We already experience road flooding after heavy or sustained rainfall to the extent that some smaller
  access roads quickly become impassable. Building a large number of houses on the land within the village would put more
demands on drainage systems and on the ability of the land to absorb rain. Further, I understand that Thames Water have
issued warnings about the unsustainability of the current waste water network should the proposed number of houses in the
area be increased dramatically as proposed in The Plan.

- Traffic and Parking: The current pressure on roads at busy times and on parking facilities is great; the station car park
  already gets full up and it is not always easy to park near the East Horsley shopping parade. In addition the state of the local
roads is a constant problem (pot holes, Telecoms and Water works) and more traffic will aggravate this.

- Facilities and Schools: It is already difficult to get appointments at the Medical Centre - what happens when there are lots
  more people to support? There don't seem to be any plans to expand the important support services. Likewise the local
State schools are full. We also have the possibility of a huge increase in demands on local services from related
development in the borough which will spill into our living space such as at the Wisley Airfield. There will also be a need
for more trains to cope with increased users - something which Southern Rail seem unable to cope with already.

- The Green Belt: It does not seem to me that this should happen as per Policy P1 & Policy P2 - The first line of Policy P2
  states, “We will continue to protect the Metropolitan Green Belt against inappropriate development.” No exceptional
circumstances or other justification is made for the new Green Belt boundaries that will result from the proposed inssetting
of the two parts of the village from the Metropolitan Green Belt. This is a precious Area Of Outstanding Beauty and every
effort should be made to stop it from being over run with infilling and commercial development which will ultimately
benefit a favoured few rather than the massive number of people who currently live and travel to this area to enjoy the
surroundings.

As a longstanding resident in the area I am very concerned at the lack of detailed thought regarding the points above and
also that the place where I live with my family and love for all the characters that it has would be changed dramatically by
these proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to express my strong views against the above proposed local plan.

In general terms I cannot understand how the plan for proposed new homes has 64% of them in the Green belt. 

At this level it suggests you have given up trying to protect the green belt. You must be able to do better than this!

Additionally, there is no clear rationale as to how the volume of new homes to be built (13,800) was arrived at. With a decision as important as this, it is not enough to say that ‘we commissioned independent consultants to conduct a survey’. 

What was the methodology? We should be able to see their report – surely there is nothing to hide?

Turning to my own area, West Horsley, I cannot understand why West and East Horsley need to be removed from the Green Belt except for the reason of jamming in an unacceptable volume of houses.

To plan to increase the houses in West Horsley by 35% and at a denser level than the existing housing stock obviously affects the character of the Village. But this is about much more than aesthetics:

1. Education: The Raleigh Primary School is already full and so is the Howard of Effingham Secondary School.

The Surrey County Council has produced no plans for increasing school places in the Horsleys.

1. Infrastructure: The local roads can barely support the existing level of traffic and parking spaces are already inadequate.

1. Drainage: Thames Water has already advised GBC that their current wastewater network will be unlikely to support the extra housing load.

1. Medical Facilities: Kingston Avenue Medical Centre struggles to serve the Horsleys already and residents complain about the difficulty in obtaining appointments. The planned population increase can only exacerbate this problem.

There seems to be no thought applied to how these problems will be resolved and they would only arise if the Guildford Plan goes through as currently shown. Unless solutions to these very real problems are found now, I do not see how this level of additional housing can be justified in the Horsleys.

I hope that you take these arguments into consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the plan’s use of the 693 new homes per year. This is an increase of some 25% on current levels of homes. This is remarkable given the ONS figure is 15% for Guildford specifically. So why are we building some 10% more houses than predicted? The 693 figure is based on invalid statistics and must be revised down. For example the ONS figure already uses economic growth in it’s figures and affordable housing is over estimated based on GBC’s own existing policies. GBC has decided to pursue AGGRESSIVE EXPANSION and Forced Growth and the residence DO NOT SUPPORT THIS.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/4237</th>
<th>Respondent: 10967041 / Ashley Brown</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I live in West Horsley and once again I object to the Guildford Local Plan on a number of grounds but in main to the ridiculous and unjustified number of houses at 13,860 with a completely unjustified increase in houses near to and within the Horsley’s:

i.e. 533 houses on larger sites, with 60 on smaller sites; over 2000 houses at Wisley Airfield, already rejected but still INCLUDED in the plan;

This is just about DOUBLING the size of the horsely’s with absolutely no new infrastructure. The current roads FLOOD regularly, the roads are terrible to drive on, the drainage cannot cope, there is no real transport links, schools, doctor’s surgeries are full. All of this against a plan which proposes taking the villages out of the green belt for no other reason than concreting them over. Planning regulations do not allow for this except in EXCEPTIONAL circumstances and taking the villages out of the greenbelt to build on them is not a valid reason.

I OBJECT to the number of cars that would obliterate the local roads, using an average of 2 cars per house this is nearly 6,000 extra cars in a village with extremely poor roads, drainage, infrastructure. The plan makes no provision for improvements.

I OBJECT to the plan on the grounds of the level of pollution introduced by these extra cars, houses etc.

I OBJECT to the plan on the grounds of the infrastructure will increase flooding where we already have flooding every year.

I OBJECT to the plan on the grounds that there is no provision for extra school places within the Horsleys in the plan despite swamping us with extra houses.

I OBJECT to the plan on the grounds of the lack of facilities proposed such as doctor’s surgeries, public transport.

I OBJECT to the plan on the grounds of transport - no real increase in public transport and the train into London each morning is now already almost full with standing room only from a few stations from Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Finally I note that the Proposed Local Plan includes the statement “We will continue to protect the Metropolitan Green Belt”. I fully support this policy. However, unfortunately GBC appears to be in breach of this same policy throughout the Local Plan! In fact 65% of developments will be made on land that is currently Green Belt so how does this statement stand up against such a blatant attack on the green belt within the local plan?

Sadiq Khan, new Mayor of London, has instructed London planners NOT to approve development on Green Belt Land within the M25. If we continue to build on our countryside it won’t be many decades before we have none left. Creeping development has led to almost continuous housing from Central London to Effingham. Is this to carry on to Guildford and beyond? (1,700 houses are planned for the Guildford end of the Hogs Back and 1,000 new houses on greenfield sites in Normandy.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17319  Respondent: 10967041 / Ashley Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There were over 20,000 complaints and comments and objections to the last local plan sent out for comment yet GBC have hardly changed any of this latest plan to reflect these, even when the 2000 houses ridiculously tabled for Wisley airfield was rejected by councillors; yet this is still in the plan!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1930  Respondent: 10967041 / Ashley Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The Large Housing Development Sites:

There were over 30,000 complaints and comments and objections to the last local plan sent out for comment yet GBC have hardly changed any of this latest plan to reflect these, even when the 2000 houses ridiculously tabled for Wisley airfield was rejected by councillors; yet this is still in the plan!

I object to the inclusion again of the proposal for 2,000 houses and other development in Green Belt at the former Wisley Airfield

This is just about DOUBLING the size of the horsely’s with absolutely no new infrastructure. The current roads FLOOD regularly, the roads are terrible to drive on, the drainage cannot cope, there is no real transport links, schools, doctor’s surgeries are full. All of this against a plan which proposes taking the villages out of the green belt for no other reason than concreting them over. Planning regulations do not allow for this except in EXCEPTIONAL circumstances and taking the villages out of the greenbelt to build on them is not a valid reason.

I OBJECT to the number of cars that would obliterate the local roads, using an average of 2 cars per house this is nearly 6,000 extra cars in a village with extremely poor roads, drainage, infrastructure. The plan makes no provision for improvements.

I OBJECT to the plan on the grounds of the level of pollution introduced by these extra cars, houses etc.

I OBJECT to the plan on the grounds of the infrastructure will increase flooding where we already have flooding every year.

I OBJECT to the plan on the grounds that there is no provision for extra school places within the Horsleys in the plan despite swamping us with extra houses.

I OBJECT to the plan on the grounds of the lack of facilities proposed such as doctor’s surgeries, public transport.

I OBJECT to the plan on the grounds of transport - no real increase in public transport and the train into London each morning is now already almost full with standing room only from a few stations from Horsley.

I OBJECT to the plan’s use of the projection for the number of new homes required per year. The figure is based on invalid statistics and almost twice the ONS projection so must be revised down. For example the ONS figure already uses economic growth in it’s figures and affordable housing is over estimated based on GBC’s own existing policies.

GBC has decided to pursue AGGRESSIVE EXPANSION and Forced Growth and the residents DO NOT SUPPORT THIS.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Green Belt:

No case has been made for building on the Green Belt for which national policy requires exceptional circumstances.

The Proposed Local Plan includes the statement “The Metropolitan Green Belt will continue to be protected”. I fully support this policy. GBC appears to be in breach of this same policy throughout the Local Plan! In fact 65% of developments will be made on land that is currently Green Belt so how does this statement stand up against such a blatant attack on the green belt within the local plan?

Sadiq Khan, Mayor of London, has instructed London planners NOT to approve development on Green Belt Land within the M25. If we continue to build on our countryside it won’t be many decades before we have none left.

I object to the continued proposed ‘insetting’ of East & West Horsley and other villages from the Green Belt and the expansion of the settlement boundaries.

I object to the statement in P2 (4.3.13) that these villages are ‘now inset from the Green Belt’ when this is only a proposal. I also object that this section does not take into account an assessment of there Green Belt benefits.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3726  Respondent: 10967329 / Steve Johnson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Major doubt concerning housing numbers - The inflated number of new houses proposed arises from a Strategic Housing Market Assessment (SHMA) that was generated by a consultant's mathematical model which is not revealed in the plan. Nor, apparently, to Guildford Borough Council (GBC). This SHMA target housing number is then further increased by GBC to give a population increase which is almost 70% higher than the official national estimates for population growth in
the Borough. The scale of this increase has alarming results e.g. an increase of up to 35% in existing West Horsley households - greater than any other single area in the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley South</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Dear Sir/Madam,

Proposal to remove the Horsleys from the Green Belt - The "exceptional circumstances" required before taking this action have not been demonstrated.

Extension of the boundaries of the Settlement areas of the Horsleys - No sound reasons have been given for the proposed changes, which seem to be aimed solely at increasing the land available within the settlements for future additional development.

Infrastructure already overloaded - The local Schools are full. Medical facilities stretched. Drainage is inadequate, roads & car parks are overloaded with little or no scope for improvements.

Station Parade is designated a "District Centre" - This "classification" results from a complete misreading of the nature of the facilities in the village centre & would inappropriately target the area for future urban developments.

Development of over 2,000 house village at Ockham (former Wisley Airfield) - The impact on the Horsley villages of such a huge mixed housing, retail, commercial, traveller & schools development, under 2 miles away, would be enormous. The plan also includes extensive developments at Burnt Common (400 houses & commercial developments) & Gosden Hill Farm, Burpham (2000 houses & mixed use developments).

Major doubt concerning housing numbers - The inflated number of new houses proposed arises from a Strategic Housing Market Assessment (SHMA) that was generated by a consultant's mathematical model which is not revealed in the plan. Nor, apparently, to Guildford Borough Council (GBC). This SHMA target housing number is then further increased by GBC to give a population increase which is almost 70% higher than the official national estimates for population growth in the Borough. The scale of this increase has alarming results e.g. an increase of up to 35% in existing West Horsley households - greater than any other single area in the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPS16/7056 | Respondent: 10967329 / Steve Johnson | Agent: |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15686  Respondent: 10967329 / Steve Johnson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Station Parade is designated a "District Centre" - This "classification" results from a complete misreading of the nature of the facilities in the village centre & would inappropriately target the area for future urban developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/15686  Respondent: 10967329 / Steve Johnson  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Infrastructure already overloaded - The local Schools are full. Medical facilities stretched. Drainage is inadequate, roads & car parks are overloaded with little or no scope for improvements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15685  Respondent: 10967329 / Steve Johnson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Proposal to remove the Horsleys from the Green Belt - The "exceptional circumstances" required before taking this action have not been demonstrated.

Extension of the boundaries of the Settlement areas of the Horsleys - No sound reasons have been given for the proposed changes, which seem to be aimed solely at increasing the land available within the settlements for future additional development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2864  Respondent: 10967489 / Jenny Jackson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. *It is therefore not fit for purpose.*

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2863  Respondent: 10967489 / Jenny Jackson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Strategic Housing Market Assessment figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposal to consider required increase in housing at 693 homes a year more than doubles the figure of 322 used in all previous versions of the Plan. *The continued lack of transparency suggests subversive and unverifiable figures which will be open to legal challenge if not included in this consultation.*

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4076  Respondent: 10967489 / Jenny Jackson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **I object** to the removal of Send and Ripley from the Green Belt because the villages and countryside provide the necessary buffer between Woking and Guildford.

2. **I object** to the complete failure of GBC to include the (sufficient) brownfield sites within the urban area which should be used for development before the open countryside and the Green Belt. Also the failure to include the Town Centre Masterplan 2015 within this version of the Plan. Developments at Garlick’s Arch, Clockbarn Nurseries and Send Hill are completely unjustified by any special circumstances – the Green Belt introduced in the 1940’s intended retaining this very countryside for future generations and in perpetuity. Guildford’s urban brownfield areas are inevitably much closer to existing transport hubs.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/5969  **Respondent:** 10967489 / Jenny Jackson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**I OBJECT** for the following key reasons:

- The plan which proposes over 70% of new housing be built within the Green Belt. There are brownfield sites within the urban areas which can easily be regenerated, without encroaching on Green Belt land which is currently protected.

- Regarding the removal of the former Wisley Airfield from the Green Belt – this site is part of the ‘lungs’ between north Surrey and London introduced following the second world war, in order to ensure public health safety to the people of London as well as those living in north Surrey. Permitting this development will serve to create an urban corridor stretching from London to Guildford, when no exceptional circumstances have been established that warrant removal of the land from the Metropolitan Green Belt.

- Including 693 houses per year (double original estimates) represents a significant deviation from earlier versions of the plan without any clear rationale other than seeking to turn Ripley, Ockham, Send and E & W Horsley into an extended London suburb. Where is the transparency?

- When taken alongside other proposals for this area, this plan contributes to over 23% of new housing - across the borough – when currently local infrastructure creaks with only 0.3% of the total population of GBC. This feels like punishment to residents for no apparent crime, other than choosing to live in rural environment.

- This plan will place unimaginable stress on transport, local roads and road safety. In particular I object to:
  1. The belief that more people will walk or use bicycles. The roads are already unsafe, lack street lighting, in part isolated, and so local residents are forced to rely on cars as reliable bus routes, and railway stations are too remote to make either option realistic. I challenge the Planning Committee to visit the area on bicycles, rather than the minibus used for your site visit prior to the April Planning meeting (which you will recall resulted in lots of time wasted due to the normal congestion on our roads – as a result of local traffic, HGVs seeking to avoid congestion on the A3 and M25 and the usual farm traffic – a requirement of rural life).
  2. In view of the above, local residents already are forced to rely on private cars in order to live from day to day.
  3. Local roads are already becoming wider as a result of encroachment by HGVs and large vehicles onto roadside banks and hedges, resulting in pot hole damage. British weather causes flooding due to the low lying area and the proximity of the water table – are their plans to address this? Pot holes go for many months unaddressed, and are then filled often during rainy weather, resulting in subsequent damage when the temperature falls – year on year.
  4. Your own investigation confirmed that an increase of 2068 homes would result in an estimated 4,000 additional cars on the roads.
5. The danger such increases will cause is directly to the very people you are identifying will take to the roads in great numbers – walkers and cyclists.

6. Again, your own investigation prior to rejecting the access plans to the Wisley Airfield site identified major problems due to anticipated additional vehicles leaving and joining both the A3 and M25 and the Ockham/Wisley interchanges. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. The plan for expansion at Wisley alone will increase visitor traffic.

7. To put together all the proposals – RHS Wisley, the proposed Wisley Airfield development and Garlick’s Arch with massive implications for traffic in the surrounding area, the wider implications in the Plan are nothing short of negligent – Junction 10 and the A3 southbound are already gridlocked for some 3-4 hours on many days each week. Perhaps a heliport should be included – the hardstanding after all is already on the Wisley Airfield site?

8. Whilst the proposal to provide additional local public transport services sounds good on paper, buses cannot move faster than other traffic which currently blocks the roads. Parking at Woking, Effingham and Horsley stations is usually at capacity and will be unable to cope with the increased passenger traffic.

   • This plan includes (to reduce necessary footprint) urban-style buildings up to five storeys high and a population density higher than most London boroughs – this is out of keeping and will be a blight on the local countryside.

   • Insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area, Sites of Special Scientific Interest and Site of Nature Conservation Interest.

   • Air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. The Plan will cause irreversible impact in habitat for wildlife.

   • You have had repeated evidence that many of the proposals in the Plan are contrary to the wishes of local communities. These proposals will inevitably receive opposition – and notably, are generally prosed to take place in areas where Councillors DO NOT live.

In conclusion, I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of intensive investigation and consideration the Planning Application submitted by Wisley Property Investments Ltd was unanimously rejected by at the Planning Committee (which I was present at) on 8th April 2016 on the recommendation of GBC Planning Officers, who presented all of my concerns and more.

These serious concerns also been presented by authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. I object to the proposed development of the Clockbarn estate in close proximity to Garlick’s Arch. Tannery Lane is very narrow and cannot take existing HGV traffic which seeks to divert into Polesden Lane, and Newark Lane, placing people and infrastructure in peril – the bridges have only been rebuilt in the very recent past and Newark Lane as it joins Ripley High Street is extremely narrow. In addition to the permission granted for 64 houses at the Tannery site, and developments at the marina the Tannery Lane, Papercourt Lane and Polesden Lane simply cannot take any more traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5904  Respondent: 10967489 / Jenny Jackson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for it’s removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5905  Respondent: 10967489 / Jenny Jackson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch. No consultation took place on this, and GBC’s Green Belt & Countryside Report does not even cover Garlick’s Arch.

The site is not appropriate because:

- There is no sustainable transport infrastructure.
- The site is liable to frequent flooding
- The site has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.
There are no plans to improve local schools, medical or utilities to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 10967489 / Jenny Jackson</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without transparent justification – if indeed it can be justified. Furthermore, the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/7638</th>
<th>Respondent: 10967489 / Jenny Jackson</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the development at Garlick’s Arch for 400 houses because it was sprung on Send and Ripley at the last moment with only 2 weeks’ notice, without any prior consultation and is not required in terms of housing need either for the villages or the borough.
2. I object to the development at Garlick’s Arch because the site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The site is also subject to flooding. Any development here would be permanent and in perpetuity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/5903  Respondent: 10967489 / Jenny Jackson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

North facing ramps to the A3 at Burnt Common would be a disaster for local communities, which do need to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic including traffic from London/M25 to Woking which would add to that already using the area as a bypass to current local congestion going through Burnt Common, Send and Old Woking. *This is unsustainable with no proposals for improvement.*

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7637  Respondent: 10967489 / Jenny Jackson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to proposals for the ‘new interchange’ onto the A3 (N) at Burnt Common which is actually unnecessary for local need and would introduce gridlock on the A247 and Portsmouth Road, all day, every day. The evidence cited about traffic is incomplete and unreliable – we all know that there will be congestion because Send would be used as a cut through from Woking to the A3/M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7640  Respondent: 10967489 / Jenny Jackson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I also object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include two Travellers Sites is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/11953</th>
<th>Respondent: 10967489 / Jenny Jackson</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3) The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy I1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

There is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that. The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses means dangerous and unsustainable traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/11957 | Respondent: 10967489 / Jenny Jackson | Agent: |
I object to the lack of proper infrastructure planning for sites (Policy I1)

The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object due to the congestion that development will cause to the A3/M25 (Policy I2)

The A3 and M25 would have to be improved before any development is done. Highways England has no plans to start considering improving the A3 before 2019/2020 and clearly no real improvements are possible within the timeframe proposed in this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), cannot take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/11955</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of consideration of poor air quality concerns (Policy I3)

The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/11947</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy. The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to development in areas which are at risk of flooding (Policy P4)</td>
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<td>The Plan does not take adequate account of flood risk as required by National Planning Policy. The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>The Plan is not sustainable (Policy S1)</td>
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<td>13,860 new houses proposed is not sustainable – it will damage local communities by the over development of Ripley, Send and Clandon. The local communities don’t need these houses. The former Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and already inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick’s Arch. The development should be in urban areas where there is sustainable transport.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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I object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey. The Plan places a disproportionate amount of development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). This will result in 36% of all the Plan’s new housing being in this area. 5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16942  Respondent: 10967489 / Jenny Jackson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

1. I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The inclusion of (temporary) students, economic need and local affordability are calculated in such a way as to inflate housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16944  Respondent: 10967489 / Jenny Jackson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
8. I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: SQLP16/1867</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
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1. FINALLY, I object to my so-called elected representatives complete disregard for the democratic process which elected you to the positions you now hold. You are in place because of the votes of local residents, your electorate, who are expressing their opinions. If you were facing elections today and this was a manifesto commitment, even your most committed stalwarts would be able to express their democratic view. To attempt to impose such a Plan mid-term is a flagrant disregard for your constituents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp173/626</th>
<th>Respondent: 10967489 / Jenny Jackson</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send Marsh/ Burnt Common</td>
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I wish to object in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2017) and in particular to the changes affecting Ripley and Send. These actually serve to increase the impact on local areas by increasing the number of houses, traveller’s sites and destruction of even more of the Green Belt, rather than as promised, take account of the thousands of objections to the 2016 Plan and many of its unnecessary proposals. By definition, the Green Belt, introduced following the second world war, was intended (and has generally succeeded thus far) to provide breathing lungs encircling large towns and cities, to improve air quality, increase opportunities for city dwellers to experience countryside and fresh unpolluted air, and generally to assist in preserving quality of life. Not only do many of the proposals serve to include Guildford Town in the over populated and congested south east even more than at present, if puts the opportunity for ‘breathing lungs’ even further from inner city dwellers reach, and increases the problems caused by potential over-crowding and congested living. The proposals focus on housing, without consideration of health, transport and education provision, unless funded by the sale of property to fund the necessary infrastructure.
There are many now disused brownfield sites, which are excluded from proposed developments included in this plan, which rather seeks to destroy woodland, desecrate open green spaces and will effectively do nothing more than provide the unaffordable housing for local people, in inappropriate and seemingly desirable settings, without supporting infrastructure.

My objections are as follows

1. **I object to the unfair imbalance of the Plan across the borough.**

   The Plan has become *even more* biased against the North East part of the borough. Guildford Borough covers an area of over 100 square miles. Of the 11350 homes currently proposed in the Plan, over 40% (4613) are within 3 miles of Ripley, **Burnt Common and Send Marsh**, most of them on Green Belt. This is *grossly unnecessary and unfair* on an already overcrowded part of the borough. The removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough places an unnecessary burden on the northeast section (Ripley and Send).

2. **I object to the lack of proper infrastructure planning for sites (A43 and A42)**

   The Foreword to the plan by Paul Spooner includes on page 5:

   > "We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan."

   The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

3. **I object to the rationale resulting in the need for massive increase in housing stock in the borough which is based on flawed evidence.** Guildford Council’s assessment of housing need is overestimated by about 40% because of inaccurate assumptions about the number of students seeking to remain in the area once completing university studies.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp173/627  **Respondent:** 10967489 / Jenny Jackson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send Marsh/ Burnt Common

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **I object to the extended development in the Green Belt (Policy P2, Site A43)**

   I object specifically to ‘Garlick’s Arch’ (A43) being extended and the resulting urban sprawl. There are *no exceptional circumstances* for this site being removed from the Green Belt, as required by the National Planning Policy.
1. **The Plan contains inconsistencies in respect of traveller sites.**

   A50 Whittles Drive, Normandy, shows on the Site details: “Allocation: The site is allocated for approximately 14 Travelling Showpeople plots ...” Clearly A50 more than covers the total assessed “need” of 8 places, (page 40, 4.2.22.) and so no “need” exists for this in site A34. This and other inconsistencies in the Plan mean no decision can be made on the basis of this document.

   **What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

   **Attached documents:**

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   **Comment ID:** pslp173/628  **Respondent:** 10967489 / Jenny Jackson  **Agent:**

   **Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send Marsh/ Burnt Common

   Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

   **Answer (if comment is on questions 1-7 of the questionnaire):** ()

   1. **I object to the principle of hiding of development by “deferment” (A24, A25, A26, A43)**

   This version of the Plan openly conceals some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects:
   i) to hide the number of housed actually being built (A24, A25, A26 – total of 1100 deferred, but still being built!), and
   ii) give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.

   **What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

   **Attached documents:**

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   **Comment ID:** pslp173/629  **Respondent:** 10967489 / Jenny Jackson  **Agent:**

   **Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send Marsh/ Burnt Common

   Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

   **Answer (if comment is on questions 1-7 of the questionnaire):** ()

   1. **I object removing Send Business Park from the Green Belt (4.3.15).**

   Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for ‘it’s insetting’ (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

   I wish these objections to be fully taken into consideration and that the Plan is amended accordingly.
1. I object to removal of Brownfield site (A34) from the Plan

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I wish to object in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2017) and my letter focusses on the developments on the former Wisley Airfield site – and the impact this will have on the immediate local area including Ripley and Ockham. I was present at a Planning Meeting earlier in the year when the Planning Committee unanimously accepted a review by one of their own officers, of the development proposals because of the complete lack of appreciation of the impact on local roads, and travel, and resulting impact on the village of Ripley, and RHS Wisley.

I note policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

My objections are as follows:
1. This is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
2. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees. The implication is that “consultation” is simply a tick box exercise
3. I object to the quantity of space allocated for retail use in the town centre. This could be much better used for residential development. I particularly object to the reliance on the Carter Jonas study update 2017 which includes “demand” for retail space from companies already in administration.
4. I object because there is a complete denial of the cumulative impact on each of the proposed housing settlements including that on the Wisley Airfield site, on existing local villages and residents
5. I object because it is adjacent to the most popular visitor attraction in the south-east, the RHS gardens at Wisley where visitor numbers are expected to increase by 500,000/annum.
6. I object because the associated traffic increase from the RHS has not been taken into account.
7. I object because the regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account
8. I object because the identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station and its impact on Wisley Village, Pyrford and West Byfleet
9. I object to the increased area of the Wisley site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
10. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills Area of Outstanding Natural Beauty (AONB) will increase the negative impact of the views from the AONB.
11. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
12. I object to the removal of additional 3.1 hectares from the Green Belt without any justification
13. I object because it is further from railway stations than any other identified strategic site and this is mitigated by the assumption that an improved local bus service will be provided ‘in perpetuity’.
14. I object because it is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)
15. I object because local roads are at capacity particularly when the Strategic Road Network (SRN) M25 Junction 19, and A3) are rarely free-flowing (accidents, diversions, roadworks etc)
16. I object because any public transport provision such as bus services to and from Guildford to Ripley (currently running a minimal service) will have to extend their route and negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
17. I object because any public transport (bus services) provision to West Horsley (necessary if Effingham Junction railway station is considered as suitable to alleviate the burden on local road networks) will impact the safety of the local road network as the current lanes (many with listed buildings as homes, and farmland along them) are not wide enough to accommodate PSVs. Also, sustainable methods of travel such as cycling and walking which are being promoted at the same time, are known to be unrealistic and unsafe. Have our local councillors already forgotten their journey in a mini bus when viewing the site earlier this year?
18. I object because there is insufficient employment available on the Wisley site so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis
19. I object because the lack of provision for retail, health and education infrastructure is predicated on the numbers of properties occupied – this is unrealistic and can too easily be renegotiated if housing remains unsold
20. I object because the changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”
21. I object because opportunity (3) should be common to all sites and is not unique to this site
22. I object to the change in Green Belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact
23. I object to para 21 which “limits” development in flood zone 2 and 3. Development MUST be excluded in flood zone 2 and 3 – many local residents will testify to the impact this already has on local homes
24. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
25. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
26. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.
27. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

28. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

29. I object to the extension of the plan period by 1 year as it has not been identified as a major change.

30. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

31. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

32. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

33. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

34. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

35. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

36. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

37. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4200  Respondent: 10967489 / Jenny Jackson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removal of Brownfield sites (A4) from the Plan

Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4208  Respondent: 10967489 / Jenny Jackson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the increase in housing proposed in Tannery Lane (site A42)

This has been increased by a third since the 2016 version of the Plan. This will have a significant impact on the already highly congested local rural road network around Send. This is in contradiction to section 2.14a of the Plan which states “Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays.” And yet there is no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4205  Respondent: 10967489 / Jenny Jackson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the allocation of 6 Traveling Showpeople sites in A34 ‘Garlick’s Arch’

The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlicks Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan. NB: A travelling showpersons site with associated storage is completely inappropriate in a rural environment, and I note the intention to release this land for additional housing in the future, should it prove an unnecessary allocation.

I object to the potential and ill-defined increase in housing allocation at A43 Garlick’s Arch

The potential of an increase from 400 houses at site A43 Garlick’s Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages.

The inclusion of site A58 Burnt Common, removes the need for A43 Garlick’s Arch)

GBC’s own reasons for including Garlick’s Arch A43 in the 2016 version were

The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm... (site allocation A25) [ than the Burnt Common site did ]”

The site [A43] provides the employment floorspace needed in the plan to help meet identified needs”

Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (Burnt Common and Garlicks Arch – which are almost contiguous) are in the plan; therefore GBC are not following their own
guidelines and objectives. A58 Burnt Common provides more than the “required” industrial space, so there is no reason for Garlick’s Arch to be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4204  Respondent: 10967489 / Jenny Jackson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the proposal for a Waste Management Facility in Green Belt (A58)

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2470  Respondent: 10967489 / Jenny Jackson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.

WE KNOW NOW that if the developer doesn’t even have to provide any ‘affordable’ homes, simply to make a negotiated payment to the Council, this is highly unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost f.i.e. a reason for not
delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit is to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6804  Respondent: 10967521 / Jayne Way  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farm Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPFF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the disproportionate allocation of housing in this specific part of the borough. Indeed over 23% of the Plan's new housing is proposed in the immediate localities my home in Ockham, together with Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that currently only has 0.3% of the population of GBC).

4) I object to the massive threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The Plan calls for a village of 159 dwellings (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2000+ dwelling development, with urban-style buildings up to five stories high and a population density higher than most London boroughs.

5) I object to the very seriously detrimental impact on the local infrastructure which in my view will be massively overwhelmed by the Plan. Roads, stations, schools to name but a few are completely inadequate to cope with the projected increase in demand.

6) I object to the fact that the proposed Plan does not meet the stated needs and desires of local communities, as evidenced in the Ockham Parish Plan. We local residents enjoy living in Ockham because of access to countryside and clean air as well as peace and quiet afforded by wide open spaces. Over 90% of residents want both the historic features of the village maintained and our village's green spaces, including the FWA/TFM, protected.

7) I object to the continued inclusion of a site (the former Wisley Airfield - now known as Three Farm Meadows) - where the planning application has been unanimously rejected by GBC's Planning Committee.
I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4518  Respondent: 10967649 / Ian Cornwall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.  
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.  
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,  
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity  
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.  
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.  
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).  
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.  
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4521  Respondent: 10967649 / Ian Cornwall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.
12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.
13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.
14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.
15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4519  Respondent: 10967649 / Ian Cornwall  Agent: 
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/574  Respondent: 10967649 / Ian Cornwall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5651  Respondent: 10967841 / Ian Pearce  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons: 1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. 2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. 3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans. 4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC). 5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs. 6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   2
   a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity? I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
   8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
   9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected. 10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and
various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the draft Local Plan for the following key reasons: 1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. 2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans. 4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars

b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads

c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements

d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)

e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without

Answer (if comment is on questions 1-7 of the questionnaire): ()
significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity. 7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCl).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

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Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

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Attached documents:

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<th>Respondent:</th>
<th>10967841 / Ian Pearce</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A35</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)
4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.

- The associated traffic increase from the RHS has not been taken into account.
- The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account.

1. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
2. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.
3. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
4. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”.
5. Opportunity (3) should be common to all sites and is not unique to this site.
6. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
7. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
8. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16).
9. I object to the removal of additional 3.1 ha from the green belt without any justification.
10. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.
11. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.
12. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
13. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.
14. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
15. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

I object to the fact that there is no clear justification for the removal of one strategic site over site A35.24. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

I object to the extension of the plan period by 1 year as it has not been identified as a major change.

I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.
I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3578  
Respondent: 10967937 / Sean Robinson  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT TO 400 HOUSES and 7000 sq METRES OF INDUSTRIAL SPACE AT GARLICKS ARCH ,opposite Send Marsh RoadThe site floods and is covered by ancient woodland.The industrial space could be comfortably located elsewhere for example Slyfield.There seems no desire to explore and develop brownfield sites.Again this would put more pressure on traffic with an escalation in the number of motor accidents.Having lived in Potters Lane for 20 years I have already witnessed this increase.On one evening there were 4 accidents outside my home at the bottom of Potters lane within the space of an hour.The river Wey is more prone to flooding.Road water runoff now more prevalent.Access onto and ingress from A3 is particularly dangerous.this road should be closed.discussions with the police suggest they are very supportive of this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3579  
Respondent: 10967937 / Sean Robinson  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
OBJECT TO THE DEVELOPMENT OF 40 HOUSES AND 2 TRAVELLER’S PITCHES AT SEND HILL. Again very narrow access that can barely take a single car let alone traveller caravans and lorries. This road particularly the steep downhill part into Potters Lane would be lethal from a traffic point of view for cyclists, walkers, motorists and children walking to schools and buses. It would also put pressure on wildlife being in close proximity to the River Wey with commensurate increase in pollution etc. I do find this particularly nonsensical most of this road is effectively a single track, with enough room for one vehicle. For circa 350 metres towards Potters Lane there is only room for one car i.e. 2 cars can’t pass. Please see attached picture. I also have reservations about the honesty of the consultation. Descending from a gypsy family on my mother’s side and even with best intentions of authorities it is highly unlikely travellers will live integrated with settled people. This leads me to believe that this may well be just a traveller site and the community will end up being mislead by the council

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3580  Respondent: 10967937 / Sean Robinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A few photographic examples. This is all very ill thought out. Councillers and politicians need to be better than this.

PLEASE CONFIRM RECEIPT OF THIS COMMUNICATION FROM GUILDFORD BOROUGH COUNCIL

PLEASE CONFIRM MY COMMUNICATION WILL BE SHOWN TO THE PLANNING INSPECTOR WHO WILL DECIDE THE OUTCOME

SENDHILL running into POTTERS LANE (range rover picture)….think this is self evident could never cope with significant increase in population with travellers using large vehicular transportation i.e. caravans, lorries etc. this is dangerous and not tenable and or 40 additional houses on contaminated community land

ACCIDENTS too many to mention in Potters Lane with ridiculous national speed limit on a narrow winding country lane

FLOODING FROM POTTERS LANE ROADWAY

PRESSURE AND FLOODING ON RIVER WEY (the river has breached this river wall in the past)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: ❰ Rover.jpg (88 KB)  
❰ Flood.jpg (88 KB)  
❰ Suzuki.jpg (158 KB)  
❰ Flood2.jpg (113 KB)

Comment ID: PSLPP16/7916  Respondent: 10967937 / Sean Robinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
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<th>Comment ID: PSLPP16/7914</th>
<th>Respondent: 10967937 / Sean Robinson</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>** OBJECT TO PRESSURE ON GENERAL INFRASTRUCTURE with it now being far more difficult to get appointments at the Send Barns surgery. I had to drive down to book an appointment for my teenage daughter as when phoned at 8 am being unable to get through that would be my only option for an emergency appointment. This has never been case in the recent past. Send’s infrastructure cannot cope.**</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>** What changes (2016)/further amendments (2017) do you suggest should be made to the document?**</td>
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<th>Comment ID: PSLPS16/6101</th>
<th>Respondent: 10968129 / Sheila Remnant</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
<td>** OBJECT TO SEND VILLAGE BEING REMOVED FROM THE GREEN BELT.** The Green Belt was intended to be permanent as required by the National Planning Policy Framework. Send’s Green Belt provides an essential buffer between Woking and Guildford providing an essential area preventing the area becoming one sprawling conurbation. Specifically I live at the bottom of [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] directly adjacent to the River Wey. There is a plethora of wildlife on the Wey to include deer, swans, cormorants, migrating geese, fox, badger, numerous fish species, snakes, barn owls, birds of prey, bats, kingfisher to name but a few species. Increased urbanisation and the associated congestion and the effects of an increase in population will bring an increase in pollution, pressure on the river with increased flood risk that will be both aesthetically detrimental to the scenic beauty and have a significant negative impact on both the wildlife and incumbent long established human habitation.</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>** What changes (2016)/further amendments (2017) do you suggest should be made to the document?**</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td>** Attached documents: **</td>
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Whilst we appreciate more housing is needed - to build 2000 houses on the Gosden Hill site would double the size of Burpham and triple the amount of traffic through Burpham. This could mean that to work/shop/visit Guildford for local people would become a nightmare. If Gosden Hill is to have its own infrastructure ie doctors, dentist, shopping and schools then it should have its own road system so that its traffic does not spoil Burpham even more. Moreover, what with the development of Garlicks Arch and Wisley Airfield there would be no green belt left between Guildford and Ripley - soon we will be joined to Kingston - then London! I understand there is also similar developments proposed for the south of Guildford which could also join us onto Farnham eventually.

At the BCA meeting we were told that the NHS are unlikely to fund a doctors surgery on Gosden Hill. How are the present two surgeries in Burpham and Merrow going to cope with the additional number of patients? There are many problems to be sorted/resolved before any building is even considered.

Gosden Hill is greenbelt land. It used to be a farm until a builder (Martin Grant) bought the farmhouse and land (obviously with and eye to build houses in the future). Once green belt land - stated as essential for its openness and permanence - has been allocated for building it will be lost forever. Brown field land should be considered and built on first before greenbelt is even considered and this only as a last resort.

The Plan does not offer sufficient evidence of exceptional circumstances to justify allocating green belt land for strategic development. Burpham in particular has already lost two farms - Weylea and Keens Farm now Weybrook Park to building. The loss of these green areas has contributed heavily to more traffic (as has the Aldi store which should never have been given permission to build on that site) and loss of being a 'village' and all that means to us. Haven't we done enough in Burpham?

I had heard that Rokers in Holly Lane are tendering an application to build a large estate with schools - this has not been mentioned in the Plan but could solve some of the housing need problems and mean that time could be given to solve the traffic problems on the north side of Guildford before any consideration is given again to the Gosden Hill site. I notice that Liddingtoin Hall has not been mentioned again or even any sites at Normandy. Why is this?

The Strategic Housing Market Assessment states a housing need number of 693 per year and this is double the figure given only four years ago. The worry that large houses are intended to be built on Gosden Hill which could make this a dormitory site for London commuters. There is a greater need for smaller properties to enable local young people to live in or near the area in which they grew up and near their friends. My own children have had to go further afield to be able to afford to purchase properties, and this is such a shame.

All this proposed building just adds up to more noise, more traffic and more importantly more pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The timing for all the building proposed seems crazy to me ie build houses, then consider sewage/water arrangements, then build roads and when all this is done a runnel under all this new build might be considered - then where would the tunnel entrance be when all suitable land has been built on. How stupid is that?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLP16/12540  Respondent: 10968129 / Sheila Remnant  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As far as Burpham is concerned the tunnel and the access to Guildford (by-passing Burpham) MUST be dealt with before any building takes place. Burpham is not coping very well with the traffic at present. We knew Burpham when the London Road was the A3 and by the time the new A3 was built it was out of date anyway. Don't make the same mistake again. The A3 is like the M25 - the planners underestimated how much it would be used by local traffic (slipping on and off) these roads were not wide enough to contain the mass traffic - then the M25 could only be widened in certain places and the same applies to the A3.

Road systems should plan for the distant future as much as possible and the problems we have right now need to be resolved as soon as possible so that planning for housing and infrastructure can take place (not the other way round).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/675  Respondent: 10968417 / Janet Ashton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas.
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceeds safe EU limits.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3319  Respondent: 10968481 / Vivienne Ottaway  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the overall number of new houses in the plan - there is insufficient evidence to justify this level of development in the Borough and inadequate plans to deal with the significant increase in traffic that would be generated as a result. The M25 and A3 are already significantly congested, not only at peak times but now often during the day too - the number of new homes proposed would significantly add to the problem and the environmental damage caused by pollution.

Please confirm that you have received this objection and that it will be shown to the Planning Inspector

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3395  Respondent: 10968481 / Vivienne Ottaway  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Appendix d: evidence base

6) I object to the overall number of new houses in the plan - there is insufficient evidence to justify this level of development in the Borough and inadequate plans to deal with the significant increase in traffic that would be generated as a result. The M25 and A3 are already significantly congested, not only at peak times but now often during the day too - the number of new homes proposed would significantly add to the problem and the environmental damage caused by pollution.

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I am writing to object to several aspects of the local plan which is currently out for consultation. These objections relate to the proposals about developments in Send and Ripley and the surrounding area:</td>
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<tr>
<td>• I object to Send village being removed from the Green Belt - the Green Belt was intended to be permanent and the Green Belt in Send is an essential buffer between Woking and Guildford to stop them becoming one conurbation. There was a clear election promise locally and nationally to protect the Green Belt.</td>
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<td>I object to the scale of the proposed development at Gosden Farm, Merrow. It is essential that Guildford town is contained and that there is a Green Belt buffer between the town and the surrounding villages</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
A25

5) I object to the scale of the proposed development at Gosden Farm, Merrow. It is essential that Guildford town is contained and that there is a Green Belt buffer between the town and the surrounding villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6480  Respondent: 10968481 / Vivienne Ottaway  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to building 45 houses at Clockbarn Nursery for the following reason:
- there is inadequate access: Tannery Lane is far too narrow and the junction with Send Road is hazardous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6597  Respondent: 10968481 / Vivienne Ottaway  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A42

4) I object to building 45 houses at Clockbarn Nursery for the following reason:
- there is inadequate access: Tannery Lane is far too narrow and the junction with Send Road is hazardous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6479  Respondent: 10968481 / Vivienne Ottaway  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to building 400 houses and 7000 sq metres of Industrial space at Garlicks Arch for the following reasons:
- on environmental grounds: this is on ancient woodland and on largely undeveloped land. If additional industrial sites are required they should be on brownfield sites for example at Slyfield or if really needed in the area at Burnt Common, where there is already some industrial development
- the addition of this number of houses would alter the character of both Ripley and Send and would put significant additional strain on the infrastructure (roads, schools, health)
- the development was not mentioned in the previous consultation document

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6478  Respondent: 10968481 / Vivienne Ottaway  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal for the Send Hill development of 40 houses and 2 traveller pitches for the following reasons:
- the grounds are not large enough for the proposed development
- Send Hill is a narrow road and not suitable for the amount of additional traffic which would be generated -the site is a former landfill and is already releasing methane. Several reports have indicated that it isn't known what was put into this site when it was used as landfill and so disturbing it could be a health hazard and could contaminate local ground water. I am sure you are now aware of the various reports including Landfill site reference GU/11/LLC, Envirosearch Report RS1100201_1_1 and Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP.
- the site is also unsuitable for travellers for the above reasons and also because of its proximity to existing houses. I question the Traveller Accommodation Assessment report by Mill Field Services as I understand that the company was dissolved in January 2011 and the report mentioned in the plan wasn't published until June/July 2012.
- any development would spoil a high amenity area set in beautiful countryside
- this development was not mentioned in the previous consultation document

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/6596  Respondent: 10968481 / Vivienne Ottaway  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A44

2) I object to the proposal for the Send Hill development of 40 houses and 2 traveller pitches for the following reasons:

- the grounds are not large enough for the proposed development
- Send Hill is a narrow road and not suitable for the amount of additional traffic which would be generated -the site is a former landfill and is already releasing methane. Several reports have indicated that it isn't known what was put into this site when it was used as landfill and so disturbing it could be a health hazard and could contaminate local ground water. I am sure you are now aware of the various reports including Landfill site reference GU/11/LLC, Envirossearch Report RS1100201_1_1 and Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP.
- the site is unsuitable for travellers for the above reasons and also because of its proximity to existing houses. I question the Traveller Accommodation Assessment report by Mill Field Services as I understand that the company was dissolved in January 2011 and the report mentioned in the plan wasn't published until June/July 2012.
- any development would spoil a high amenity area set in beautiful countryside
- this development was not mentioned in the previous consultation document

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13817  Respondent: 10968481 / Vivienne Ottaway  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

P2

1) I object to Send village being removed from the Green Belt - the Green Belt was intended to be permanent and the Green Belt in Send is an essential buffer between Woking and Guildford to stop them becoming one connerbation. There was a clear election promise locally and nationally to protect the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: SQLP16/2131  Respondent: 10968705 / Hazel Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Proposed Submission Local Plan.

The plan proposed a massive amount of housebuilding in the Borough, which will spoil the countryside and the local villages.

Guildford Borough does not need the level of housing development proposed by this plan. The Strategic Housing Market Assessment (SHMA) is flawed.

I object to the proposals to develop many sites that are currently part of the Green Belt. There are no exceptional circumstances for doing this.

I object to the insetting of the villages within the Borough, especially East and West Horsley.

I have grown up in a village in the Borough and I would like to be able to remain here, but the type of housing that will predominate as a result of this proposed local plan will be out of reach to first-time buyers such as myself.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8297  Respondent: 10968993 / Alastair Cameron  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Dear Sirs,

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the inclusion in the plan of: -

1. a) The Former Wisley Airfield, now known as Three Farms Meadows – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings, and

1. b) The Paddocks, Rose Lane, Ripley – Allocation A57 – the site is allocated for 4 Traveller pitches

I object to the draft Local Plan for the following key reasons:
• I object to this version of the local plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas, which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
• I object to the removal of the Former Wisley Airfield from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to the Former Wisley Airfield, an area that at present has only 0.3% of the population of GBC).
• I object to the threat the Local Plan poses to the historic rural villages of Ripley, Ockham and the blight on properties there. The plan calls for Ockham, a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where GBC’s Planning Committee has already unanimously rejected the planning application.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd.’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

• I also specifically object to the proposal that 4 traveller pitches be formally established at The Paddocks, Rose Lane, Ripley:
  1. The current occupant has temporary consent until 2018, granted by the appeal inspector in 2015; in conclusion, the inspector wrote
"45. Overall, therefore, I conclude that temporary planning permission should be granted for a temporary period of 3 years. This allows sufficient time for alternative sites to become available and provides accommodation for the appellant and her family in the intervening period."

This summary by the inspector hardly implies an expansion of the site to 4 pitches, and although the policy specifies single family occupancy, this will be impossible to control and multi-family occupancy will result, if not already in place.

1. Policy A57 states: "Bricks and mortar housing, or any buildings capable of being converted to bricks and mortar housing, are not appropriate and will be resisted on this site". As has been reported, a brick dwelling has already been constructed.

If this policy is realized, the expansion of this sensitive green belt site is likely to continue indefinitely - on the lines of the West End Farm development which we saw in 2009, which in the end was only stopped by private legal action.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID:  | PSLPA16/729  | Respondent:  | 10969249 / Kim Taylor-Peat  | Agent:  |
| Document:    | Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID:  | PSLPS16/1184  | Respondent:  | 10969249 / Kim Taylor-Peat  | Agent:  |
| Document:    | Proposed Submission Local Plan: strategy and sites 2016 / Policy A35 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

9. I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I would like these objections to be fully considered and for the Wisley Airfield (Three Farms Meadows), Allocation A35, to be removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2347  Respondent: 10969249 / Kim Taylor-Peat  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2348  Respondent: 10969249 / Kim Taylor-Peat  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2349  Respondent: 10969249 / Kim Taylor-Peat  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

8) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2345  Respondent: 10969249 / Kim Taylor-Peat  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I am writing to object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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| Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send |

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<th>Comment ID: PSLPA16/2137</th>
<th>Respondent: 10969409 / Alistair Gibson</th>
<th>Agent:</th>
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</table>

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to object to the plans for Send.

I object to Send Village being removed from the Green Belt, Local councillors gave an election promise to protect the Green Belt and this reneges on this.

I object to the Building of 400 houses and 7000 sq metres of Industrial Space at Garlicks Arch, the site floods and is ancient woodland.

I object to 40 houses and 2 travellers pitches at Send Hill, this road is too narrow to cope with this.

I object to a new interchange with the A3 at Burnt Common as Send would become gridlocked as it is already struggling, noise and pollution levels would be too great.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/499  **Respondent:** 10969441 / Mark Woodman  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. There is a lack of specific details of essential infrastructure.

5. The existing slip road is to become a two way road which will put far more traffic into Burpham that it just cannot take.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/498  **Respondent:** 10969441 / Mark Woodman  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I can find no evidence for the alleged housing need numbers of 693 a year which is more than double the previous figure of 322 in 2012.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/693  Respondent: 10969441 / Mark Woodman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 2016 Draft Local Plan, for the following reasons:

1. The loss of Green Belt land, more specifically the proposed Green Belt development at Gosden Hill.

1. Tunnelling of the A3 should be agreed before Gosden Hill is planned for development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1396  Respondent: 10969441 / Mark Woodman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. There is a disproportionate level of development in one area of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/303  Respondent: 10969441 / Mark Woodman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The consultation period is limited in time. I believe the Local Plan should be presented properly at public
consultations and the feedback taken on board because I don’t see that it has been to date.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4176  Respondent: 10969441 / Mark Woodman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing in response to the revised Local Plan out for consultation. I don’t believe you have addressed the objections I
raised previously. I also believe the Draft Local Plan is still unsound and unsustainable. My objections are listed below:

You are trying to build far too many houses in Guildford. I know we need more housing but they need to be of the right
type with affordable ones for first time buyers. Where do your figures come from? We do not need nearly 14,000 new
homes in Guildford.

2,000 new homes on Gosden Hill would be a huge mistake. The infrastructure simply is not there and Burpham cannot take
any more traffic. The roads are already blocked every day, the pollution is in excess of permissible levels and will only get
worse. The thousands of vehicles that will be generated that will mostly travel through Burpham is dangerous for
pedestrians and for all our health. You recently allowed the Aldi application who have since then broken every planning
restriction originally passed and now the large lorries are numerous, dangerous and heavily polluting.

You should be looking at rerouting the A3 around Guildford, even in a tunnel under Guildford. Three lanes into two lanes
as currently through Guildford causes gridlock most days and when there is an accident all that traffic goes through
Burpham. That is just crazy and dangerous and seriously harms our health.

You cannot take our Green Belt away. Housing in Gosden Hill is in our Green Belt and with such plans you are eventually
going to join Guildford up with Woking and/or Clandon. You need to safeguard our countryside from encroachment, from
merging into other towns and preserve the character of Burpham.

For all the above reasons I strongly object to the Guildford Borough Council Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1550  Respondent: 10969601 / Jenny Paviour  Agent:
I would like to know also why houses are built first and then the amenities such as doctors surgeries, dentists, schools the basic infrastructure of a working social living area are thought of after, surely it should be included within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2904  Respondent: 10969601 / Jenny Paviour  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the development at Garlick Ash for 400 houses because it was sprung on the village at the last moment with only 2 weeks' notice and without any prior consultation and is not required in terms of housing need either for the village or the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2903  Respondent: 10969601 / Jenny Paviour  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to a new interchange with A3 at Burnt Common, because Send would have to take traffic from the proposed 2000 new houses at Wisley Airfield, 2000 houses at Gosden Hill, Bupham and 1850 at Blackwell Farm. Much of this traffic to and from the A3, M25, Woking and Guildford would go through Send. Send Road, which is already overloaded would become gridlocked. Noise and pollution levels, already at excessive levels, would worsen. This must be avoided. I feel that the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6358  Respondent: 10969601 / Jenny Paviour  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6355  Respondent: 10969601 / Jenny Paviour  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

May I request that my comments below are shown to the Planning Inspector and that I have confirmation that Guildford Borough Council has received my communication.

I would like to object to Send Village being removed from the Green Belt as the surrounding countryside provides a necessary buffer between Woking and Guildford. And as it is Green Belt, I object to it being built on at Garlick Ash, Clockbarn Nurseries and Send Hill. Green Belt is meant to be permanent and not continually eroded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/6359</th>
<th>Respondent:</th>
<th>10969601 / Jenny Paviour</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
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</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I feel that Guildford Borough Council has had a complete failure to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<table>
<thead>
<tr>
<th>Comment ID:</th>
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<td>Document:</td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I feel that the exaggerated 'housing need' figure of 13,860 is far too high and result in the completely unnecessary development of the Green Belt.

I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford's urban brownfield areas much closer to existing transport hubs.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/588  **Respondent:** 10969985 / Guy Middleton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I write to object to the GBC 2016 draft local plan proposals, proposals that clearly have not been fully considered.

I understand the need to increase available housing across Surrey, but the number of new houses proposed does seem excessive, and the GBC 2016 draft local plan proposals will create significant problems. The community of Send, Ripley and Clandon clearly does not want building of this scale to take place, and perhaps more importantly, there is insufficient infrastructure around these villages to support this development.

The community already has an extremely limited health centre and schools, which would both need considerable investment should more houses be built. But perhaps an even greater concern however is the vast increase in traffic that would be brought to the area, and the totally inadequate road infrastructure which simply would not cope. The building of industrial sites and new north facing slip roads to/from the A3 at Burnt Common would only increase traffic travelling through the area, particular in a north/south direction through both Send/Old Woking and Clandon, and make this significantly more of a problem. The only way these villages could feasibly cope with this increased volume of traffic would be to build a major and much wider roadway (potentially a dual carriageway), including cycle paths, from central Woking through to the A246/A25 junction at the bottom of Newlands Corner.

Failure to put this road infrastructure in place, before any development that led to an increase traffic, would be both negligent and potentially criminal, as it could easily result in legal action being taken against Guildford Borough Council should the number of road accidents increase following any development in the area.

As a result of these concerns:

1. I object to the building of new north facing slip roads to/from the A3 at Burnt Common due to the increase in traffic travelling through the area, and the lack of a sufficient road infrastructure to cope with this.
2. I object to the building of c.400 new homes and an industrial site at Garlick's Arch due to both the lack of local facilities, and the increase in traffic within the area, and the lack of a sufficient road infrastructure to cope with this.
3. I object to the building of c.2000 new homes at Wisley airfield due to the increase in traffic within the area, and the lack of a sufficient road infrastructure to cope with this.
4. I object to the lack of prior provision for an adequate road infrastructure.
5. I object to the lack of immediate provision for new schools.
6. I object to the lack of immediate provision for new health / doctors facilities. 7. I object to the disproportionate amount of development in this particular area of the Borough.
7. I object to the scale of the GBC 2016 draft local plan proposals due to the resulting significant loss of Green Belt land.

I sincerely hope that, after full consideration has been given, sense will prevail and the GBC 2016 draft local plan proposals for Send, Ripley and Clandon will be scrapped.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp173/322  **Respondent:** 10969985 / Guy Middleton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to the proposal to inset Send Business Park from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp172/2527  **Respondent:** 10969985 / Guy Middleton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to the Policy A42 change at Clockbarn Nursery, Tannery Lane because:

- The plans have increased from 45 homes to 60 homes which is 33% and this is too much
- It ignores all the hundred of previous objections made by local people
- It will increase problems with the traffic in Tannery Lane and at the A247 junction
- It will cause erosion of the Green Belt in our village
- It will increase surface water flooding, which is already a problem and is increasing with further development
- It will impact on the open countryside views from the River Wey Navigation
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2528  Respondent: 10969985 / Guy Middleton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43 change at Garlick's Arch, Send Marsh because:

• It ignores all the thousands of previous objections made by local people
• The is no proven demand for Travelling Showpeople plots in this location
• It is beautiful permanent Green Belt and no ‘exception circumstances’ exist
• It will cause over development of our village and the number of homes is excessive
• It is exquisite ancient woodland that existed at the time of Elizabeth 1
• It will join p Ripley and Send and defeat the key purpose of Green Belt
• It is subject to frequent flooding and is currently a flood zone 2 allocation
• It is contaminated by lead shot accumulated over 50 years
• It will generate excessive traffic that will block up the local roads of Send and Ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2529  Respondent: 10969985 / Guy Middleton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A58 change at Burnt Common, London Road because:

• It was deleted from the 2014 draft because of all the objections made previously
• The word ‘minimum’ is a change from the previous ‘maximum’ in the 2016 plan and since that time there has been a decline in the demand for industrial land
• There is no need to build industrial or warehouse developments in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt
- The impact on small surrounding roads will create traffic gridlock
- It will join up the existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1688  Respondent: 10970337 / Chris Crawshay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the 30 hectares of Garlick's Arch in this Plan. This site is new and was not included in the Regulation 18 Draft, and has not been consulted on previously. It forms part of the Green Belt and is permanently protected by the NPPF, which is there to prevent the merging of settlements. It also contains around 5 hectares of ancient woodland, some of which dates back to the 16th century.

Any further industrial space required could easily be accommodated at Slyfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1689  Respondent: 10970337 / Chris Crawshay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The new slip roads proposed for London bound traffic, which would lead to and from the A3 by the bridge on the A247 over the A3 would vastly increase traffic flows in the Burntcommon, Send & Clandon village areas. The A247 through Send would be gridlocked at rush hours, and in all probability for most of the day. At present there is a constant flow of traffic around the Burntcommon roundabout (by the Shell petrol station and Little Waitrose) all day and evening. I fear that those of us living in Boughton Hall Avenue, about 100 yards from this roundabout, would find access to and from our Avenue very difficult indeed. Our junction with the B2215 is our only entry and exit point and there are at present 76 detached properties in this estate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: pslp172/4383  Respondent: 10970497 / Michael Cook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4384  Respondent: 10970497 / Michael Cook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
<p>| | |</p>
<table>
<thead>
<tr>
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</thead>
<tbody>
<tr>
<td>1.</td>
<td>I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches</td>
</tr>
<tr>
<td>2.</td>
<td>It ignores all the thousands of previous objections made by local people</td>
</tr>
<tr>
<td>3.</td>
<td>There is no proven demand for travelling show people plots in this location</td>
</tr>
<tr>
<td>4.</td>
<td>There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.</td>
</tr>
<tr>
<td>5.</td>
<td>The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.</td>
</tr>
<tr>
<td>6.</td>
<td>This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green belt be intent on conserving it rather than exploiting it.</td>
</tr>
<tr>
<td>7.</td>
<td>The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.</td>
</tr>
<tr>
<td>8.</td>
<td>Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.</td>
</tr>
<tr>
<td>9.</td>
<td>The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.</td>
</tr>
<tr>
<td>10.</td>
<td>I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.</td>
</tr>
<tr>
<td>11.</td>
<td>I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.</td>
</tr>
<tr>
<td>12.</td>
<td>I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.</td>
</tr>
<tr>
<td>13.</td>
<td>I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.</td>
</tr>
<tr>
<td>14.</td>
<td>I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.</td>
</tr>
</tbody>
</table>
15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site.

2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.

3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/528  Respondent: 10970497 / Michael Cook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2844  Respondent: 10970721 / John Sherborne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to the proposed developments in Send;

Road communications in the area are already inadequate, the A247 being frequently at a standstill, solid traffic from the a25 junction to old Woking occurs with the slightest perturbation. Any further development in the area is going to make this worse. Increasing access to the A3 will be an even more serious negative affect as it draws more traffic into the area.

Send Hill development is completely inappropriate, and would destroy a large swathe of unspoilt countryside. Developing green belt land is entirely contrary to the spirit of the green belt concept.

The access roads are single track roads, and are already congested.

Send is a small village, and struggles with the traffic passing through to Woking already, introducing additional commercial traffic can only make this situation worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1880  Respondent: 10970817 / Lee Crane  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A42 change at Clockbarn nursery in Tannery Lane because the increase of 15 homes takes the count to 60 homes is way too high for the area and will put the surrounding infrastructure under pressure ignoring hundreds of previous objections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1879  Respondent: 10970817 / Lee Crane  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to the Policy A42 change at Clockbarn nursery in Tannery Lane because the increase of 15 homes takes the count to 60 homes is way too high for the area and will put the surrounding infrastructure under pressure ignoring hundreds of previous objections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<th>Comment ID:</th>
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<th>Respondent:</th>
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I object to policy A43 change at Garlick’s Arch because again it ignores the thousands of previous objections, there is no proven demand for travelling show people plots in this location. There are no “exceptional circumstances” existing to justify removing the area from permanent Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/3151</th>
<th>Respondent:</th>
<th>10970945 / Lee Snell</th>
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<td>Document:</td>
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I strongly object to the draughted plans for the site A35- Wisley Airfield and site A25 gosden hill farm, as this will destroy the trusted close community installed in Ripley and the surrounding areas and will cause major congestion in the area. 4000 homes is totally inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/3152  Respondent: 10970945 / Lee Snell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A43a the on and off ramp at Burnt common/Clandon as there are already traffic problems in peak hours, so how will this help the current problem by adding more homes!

I object to any sites planned to be built on the green belt as a whole, let's not destroy what little countryside we have left

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6875  Respondent: 10970945 / Lee Snell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I moved to Send 2 years ago with my wife for a couple of reasons.

I wanted to move near a village pub to appreciate a quiet village life with low congestion and enjoy long quiet walks in the country.

I foresee the plans as being a complete destruction to the community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6876  Respondent: 10970945 / Lee Snell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the disproportionate amount of development in one area of the borough, as by overdevelopment in conservation areas and on the green belt this could cause major floods as drainage could fail to cope with the onslaught of rain water during the winter months.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/340  Respondent: 10971329 / Ian McCulloch  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am a resident at [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] West Horsley, Surrey, and have lived at this address for over nine years having lived within the county for close to 40 years.

I strongly object to the proposed plans for building within the West Horsley village, the scale and density is completely out of keeping with the density of the village housing currently and will fundamentally over crowd and negatively impact the character and setting that the current villagers enjoy and are entitled to.

The village does not have the infrastructure to cope with a 35% increase in housing, drainage is poor with frequent flooding, there is almost no public bus service with transport primarily to and from London resulting in a dormitory increase rather than local jobs and enterprise.

The NPPF requires that plans MUST respect character and density and these proposals clearly do not and they should be rejected in there entirety.

For these reasons the villages should not be removed from the green belt and the plans do not offer sufficient justification for such a reclassification having failed to prove 'very special circumstances'; there are alternatives as outlined below.

The increased housing would be far better placed in and around GUILDFORD itself, transport links exist, public amenities, park and rides, large supermarkets and local schools. Increases in GUILDFORD homes would add a positive dimension to the local businesses in the city, increase enterprise and job creation as the infrastructure would be able to cope.

There appears to be a disproportionate burden being placed on West Horsley with a 35% increase in homes whilst Guildford itself has a plan for 11%, this would appear to fly in the face of common sense and the actual situation on the ground with regard to suitability . The actual fully costed proposals to build this volume of homes in West Horsley, once infrastructure is accounted for, will be far higher than in Guildford and that's before the loss of the village and its unique character is accounted for. In this time of austerity the council would be wasting public funds that should be spent on essential and much needed services elsewhere.

Based on my daily experience living in the village I would make the following observations:

1. The roads are already overcrowded and cannot take additional traffic.
2. The station car parks are at capacity now.
3. Village parking is at capacity now
4. Surgery is at capacity now.
5. Schools are at capacity now.

In summary the proposals do not take into account how the current population will be impacted NOR how the proposed new residents would have to deal with the inadequate setting they would find themselves in.

It therefore serves neither of the core stakeholders it is intended to.

The Raleigh School

The proposed move and redevelopment of this school should be opened to a public consultation.

In my view the school, whilst very good, has lost sight of its core purpose which is to serve its local community rather than have children driven in from Cobham and other towns further afield. If these children were educated in their own towns there would be no over crowding issues at the Raleigh. The issue for the council is to address educational needs where people live rather than increasing traffic and cost to all by not proactively dealing with the problem at source.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2314  Respondent: 10971649 / Mark Herbert  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a resident of Send my objections refer to the 2016 Draft Local Plan and specifically the planned developments in the immediate area. Of particular concern is Garlick's Arch, Clockbarn Nursery & Winds Ridge developments.

• I object to the removal of Send and Ripley from the Green Belt which is intended as a permanent status and gives the area its identity.
• I object to all proposals to build on the Green Belt at Send and elsewhere in the borough when all the required development can be accommodated in Guildford’s urban brownfield areas.
• I object to the disregard for the impact of proposed developments on local infrastructure, specifically relating to schools, medical requirements and volume of traffic on local roads.
• I object to the disproportionate development in one area of the Borough.

I request my comments are shown to the Planning Inspector who will make the decision on this. Please confirm receipt of this email. If you need any further explanation or expansion of any of the comments please contact me.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/995  Respondent: 10971681 / Sylvie Mullen  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Introduction
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a resident in Ripley, I **object** to the new local plan put forward by Guildford Council, which are: Site A43 Garlicks Arch, Site A58 Burt Common and Site A42 Tannery Lane. I strongly believe that the plans put forward will be difficult to complete as they are unrealistic and inconsiderate.

First of all, the increase in housing numbers from 45 to 60 at Site people in Tannery Lane will have use Polesdon Lane to get to Ripley high street, as well as Woking, and the A3. Using these roads every single day, I can clearly state that Ripley and its little lanes are already majorly crowded, unable to take two-way traffic, which is dangerous as cars are already driving on pavements, putting pedestrians in danger. Also, this means that children walking and playing are endangered.

Secondly, the creation of an industrial zone and waste management within a small village seems extremely inconceivable given that this can only lead to further increased traffic, likely to be trucks, in a small residential village. This goes back to my previous comment about the safety of residents.

Finally, the inclusion of 6 x Travelling Showpeople plots with associated storage facilities is entirely inappropriate in a rural environment within the Greenbelt. The allocation of these plots would [Response has been reacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature] which would affect the current residents who, some, have been here for years.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPA16/3132</th>
<th>Respondent: 10972065 / Sarah Cocke</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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1. **APPENDIX C**

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. **The plan says that “allocating these sites does not grant planning permission for development.”** However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as well as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as well as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
1. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. **POLICY A25 - Gosden Hill Farm**

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 – 2014 from Crashmap data

- Clendon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from
encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
1. POLICY A43 AND A43a – Garlick’s Arch

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council’s eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of
Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12993  Respondent: 10972065 / Sarah Cocke  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D3

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12997  Respondent: 10972065 / Sarah Cocke  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12960  Respondent: 10972065 / Sarah Cocke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E1

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.
I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. **POLICY E5**

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>PSLPP16/13006</th>
<th>Respondent: 10972065 / Sarah Cocke</th>
<th>Agent:</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E6</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY E6**

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12988  Respondent: 10972065 / Sarah Cocke  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. **POLICY H1**

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students are accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
1. POLICY H2

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12999  Respondent: 10972065 / Sarah Cocke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

POLICY H3

1. I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations were available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.)

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. **POLICY I1**

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 10972065 / Sarah Cocke</th>
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Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

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Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and
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Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. **POLICY I3**

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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1. **POLICY P2**

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional
circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.
Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

In particular, as a resident of West Clandon, living on The Street, I am concerned that the infrastructure is not sufficient, in particular the road through West Clandon will not support the additional traffic that development will bring. The road is already dangerous as the number of accidents attest.

I object in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these
adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1537  Respondent: 10972065 / Sarah Cocke  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.
The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1539  Respondent: 10972065 / Sarah Cocke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of ”About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites-which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.
1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1541  Respondent: 10972065 / Sarah Cocke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/8143</th>
<th>Respondent:</th>
<th>10972097 / Ardina Edwards</th>
<th>Agent:</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
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Proposed Submission Local Plan

I have reviewed the Proposed Submission Local Plan published by Guildford Borough Council (GBC) for public consultation- and am dismayed by some important aspects of its content.

In particular:

1. I do not agree with the scale of the proposed house building programme. The target shown represents a 25% increase in the Borough housing stock. However, the Office of National Statistics projects merely a 15% population increase for Guildford Borough over the same period.

Therefore I object to the Borough housing targets set out.
1. The Local Plan incorporates the statement "We will continue to protect the Metropolitan Green Belt". However, GBC would seem to be in breach of this aim through the housing policies it has set out in the Local Plan, in which 65% of the developments will be made on land that is currently Green. This includes the proposal to inset East Horsley from the Green Belt, propose boundary changes and the proposal to remove Wisley Airfield from the Green Belt.

Consequently, I object to the proposed intrusions into the Green Belt, which will have a material adverse impact on the area.

1. The infrastructure proposals appear inadequate to meet existing and current needs, let alone those of the area after the additional proposed developments in the local Plan.

Therefore, I object to the proposed infrastructure proposals.

5. Consequently, in summary, I object to the Proposed Submission Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp173/182  **Respondent:** 10972097 / Ardina Edwards  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

+ The Plan continues to propose "insetting" East Horsley from the Green Belt.

+ Changes in settlement boundaries mean the East Horsley settlement area will increase by 37% and include most roads south of the A246.

+ Development of 100 homes is still proposed near Horsley station.

+ Development of some 2000 homes is still proposed on the former Wesley airfield.

+ Around 57% of all new housing in the Local Plan is on land which is currently Green Belt.

+ While the ONS forecasts population growth for Guildford at 10.4% over the period of the Plan, GBC proposes to increase housing stock by 22%.

+ Consequently, I strongly object to the excessively high housing targets being set, the failure to recognise the various constraints to this development and the large-scale destruction of the Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/2575  **Respondent:** 10972257 / M.J Langford  **Agent:**
I am writing to strongly object to the proposal to build 1,100 houses and a 1,500 pupil secondary school and 6 show people pitches with yards on site 368 Normandy and Flexford strategic site.

This was safeguarded in the 2014 local plan. The 100% increase in the number of houses will rip the rural heart out of Normandy, and destroy our rural environment forever.

Exceptional circumstances have not been demonstrated for this site to be removed from the Green Belt. Guildford has unrestrained house building, surrounding authorities apply constraints to the annual housing number due to the Green Belt, why is ours being built over! The land inquestion is prime grade 3 arable and pastoral land and should be kept as such.

The local roads cannot cope with current levels of traffic, reulting in slow moving queues, producing excessive amounts of exhaust pollution. Allowing this development to go ahead will threaten the health of our old people and children. Further housing development around Guildford on any large scale in the Green Belt is destructive and environmentally disaterous. More houses should be built on brownfield sites, redundant offices and stops around Guildford Town Centre. Guildford Borough Councils Local Plan is unsustainable and is against the wishes of most local people.

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

We suggest the following changes and amendments to the document:

- The site should be removed from the Green Belt as exceptional circumstances have not been demonstrated.
- More emphasis should be given to brownfield sites and redundant offices.
- The impact of the development on local roads and environment should be thoroughly assessed and addressed.
- The inclusion of Blackwell Farm development is not sustainable and goes against the wishes of local people.
I object to the latest changes to plans for the above villages.

1. GARLICK’S ARCH (POLICY A43) KILN LANE SENDMARSH.
2. CLOCKBARN NURSERY IN TANNERY LANE, SEND (POLICY A422)
3. BURNT COMMON – PROPOSED SITE FOR MIN: 7000sq.m. INDUSTRIAL SPACE (POLICY A58)

Whatever happened to ‘GREEn’? our green belt up to now has been jealously guarded. Your intentions to [illegible word] our villages beggars belief!

The roads around this area are choked with traffic jams every whichway.

What about the need for schools, medical facilities, sewage drainage-plants: and returning to problem of extra traffic many families have 2 or 3 cars per household. and extra POLICE STATIONS? needed?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2888  Respondent: 10972385 / M.E. Firingstein  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the latest changes to plans for the above villages.

1. GARLICK’S ARCH (POLICY A43) KILN LANE SENDMARSH.
2. CLOCKBARN NURSERY IN TANNERY LANE, SEND (POLICY A422)
3. BURNT COMMON – PROPOSED SITE FOR MIN: 7000sq.m. INDUSTRIAL SPACE (POLICY A58)

Whatever happened to ‘GReen’? our green belt up to now has been jealously guarded. Your intentions to urbanise our villages beggars belief!

The roads around this area are choked with traffic jams every whichway.

What about the need for schools, medical facilities, sewage drainage-plants: and returning to problem of extra traffic many families have 2 or 3 cars per household. and extra POLICE STATIONS? needed?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/17  Respondent: 10972833 / Robin L. Smith  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Green Belt - Policy 2 at Paragraph 4.3.15

I object to the proposal to inset Send Business Park from the Green Belt because:

- It is a non-conforming user (i.e. does not belong there) in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- Severely restricted vehicle access in both directions of Tannery Lance
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

I am greatly saddened and angry that a local authority continues to pursue policies that are fervently opposed locally - one has to wonder what is the real driver for such rigid persistence?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/276  Respondent: 10972833 / Robin L. Smith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the above plan in many ways as follows and below in detail:

Policy A42 - Tannery Lane

- Erosion of the Green Belt - ruining the landscape for generations to come
- The increase from 45 homes to 60 homes
- Ignores all past objections (100) made by the by locals
- Acerbates access and traffic problem at the junction of A247 and Tannery Lane
- Surface water flooding will increase

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/277  Respondent: 10972833 / Robin L. Smith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
**Policy A43 - Garlick’s Arch**

- Ignores all the thousands of previous objections
- What case is there to dump Travelling Show People at this location
- It is Green Belt and these policies are not "Exceptional Circumstances"
- Change the current the whole nature of Sendmarsh beyond recognition
- Destruction of Woodland that has been in existence since Elisabeth I
- Ripley and Send will cease to be separate entities - just one continuous housing scheme
- The traffic flow is already terrible at rush hours and no plan (a3 extra access) will alleviate this - such proposals are hogwash and trying to coin people

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Policy A58 - London Road/Burnt Common**

- Was removed from the 2014 plan due to the myriad of objection
- Crucial change was from "Maximum" to "Minimum" leaving an open ended excuse for any amount of such industrial space
- Industrial space is not required as there is a decline in the demand of any such space with plenty "For rent" signs all over the place for such space
- Such a development will be bang in the middle of the green belt whilst Guildford and Slyfield still have vacant sites of various kinds including industrial
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough - **not the huge allocation of 10 hectares at Send in the Green Belt being proposed**!!!
- The already heavy traffic upon the small surrounding roads will cause gridlock
- Cause the distinctive separation of the different villages to disappear and defeat the purpose of Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/3643  **Respondent:** 10977441 / Nataliya Smirnov  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to this policy.

The above sites are within the designated Green Belt area.

Per NPPF, “inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances”. The proposed developments are inappropriate by their scale and nature, especially within Green Belt. It will make the Horsleys a town, not a village, so perhaps, the Council should think of consulting the residents on a proposal to change the status first.

There is nothing in the above policy proposals to demonstrate the required “exceptional circumstances”.

The proposed increase in the housing stock is considerably above of the current level of 15% population increase. Our infrastructure and local facilities and amenities are already under a lot of strain, our roads are not able to cope with any further increase in traffic - all of which need a considerable investment even without the proposed developments. If the Council struggles to find the funds now, what state of these would be following a dramatic jump in the population resulting from the proposed developments?

The proposed developments will make an irreversible footprint on the environment, forever destroying the natural beauty that is so much cherished and enjoyed by everybody who lives or visits our area.

While I appreciate the need for new dwellings, available brownfields should be allocated to meet this need in the first instance. The proposed plan however has not demonstrated sufficient consideration of the available brownfield sites potential.

I am very concerned that the local authorities, having already held a consultation in 2014 resulting in a high number of registered objections, still continue with the outlined proposals in what appears to be a single-minded and dictatorial style of approach. I strongly object to all proposed developments in policies A36-A41 and hope that my voice will be heard.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comments on Proposed Submission Local Plan: Strategy and Sites 2016 - Consultation

Policy A35: Site Policy – Land at former Wisley Airfield

I would like to register my strong objection to this policy.

The proposed development will result in approximately 2,100 homes.

Increase in new dwellings of such scale does not only have a serious impact on infrastructure and local amenities, but will also irreversibly change the face of nearby villages like Ockham and the Horsleys, making them akin to towns.

Our current infrastructure and roads are insufficient and are not able to cope with any additional increase in use. As an existing resident, I certainly have noticed pressures experienced by our medical centre and schools, all of which are already stretched to their limits, even under our present number of residents.

To accommodate the increase in population resulting from developing Wisley Airport into 2,100 new homes, new roads, schools, medical centres, drainage and water supplies as well as other amenities would need to be built. However, our surrounding areas are simply not able to absorb any significant additional infrastructure development without being truly destroyed. There is simply not enough physical space.

When considering the full effect of this new housing, the Local Council should take into account and assess responsibly the seriousness of the impact and significant deterioration in the quality of life that would result from this development, not only for the local residents and the surrounding flora and fauna, but also to those who would move to their new homes in the former Wisley Airport, should this development go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/11981</th>
<th>Respondent: 10977441 / Nataliya Smirnov</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P2: Green Belt

I strongly object to this policy.

The local plan document states that “the main aim of Green Belt is to prevent urban sprawl by keeping land permanently open. Green Belt also provides opportunities for people to access the countryside, to protect land for agriculture, forestry and similar land uses, and for nature conservation”.

Your document states that “national planning policy requires that Green Belt boundaries are only amended in exceptional circumstances”. The housing need appears to be the sole purpose of removing our villages from Green Belt. While there is a general need for new dwellings in the UK, it does not support a case for “exceptional circumstances”. 
Removing villages listed in para 4.3.13 of the plan document, will give way to a burst of developments, most of which are likely to be of a commercialised urban nature which will inevitably result in losing the rural appeal of the area. It will destroy the existing surrounding nature by effectively allowing London boundaries to overflow. The beauty of Surrey Hills has earned a reputation that has attracted many visitors from the UK and abroad over the years, to the extent that our surrounding areas were selected to represent Great Britain on numerous tournaments of 2012 Olympics. Areas surrounding our villages continue to be regularly enjoyed by the British sports enthusiasts and visitors all year round.

The area has been the pride and joy of many residents who tirelessly work on maintaining and keeping our precious nature, accessible to all, at our door step.

I urge you to re-consider and to save our open land, nature and the villages for future generations by keeping Green Belt boundaries unchanged.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/2462  **Respondent:** 10984161 / Tony McGraw  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please forward my objections to the planning inspector(s) deciding on the Send plans mentioned below.

I would also like confirmation that this email has been received and forwarded, please.

I object strongly to Send being removed from the Green Belt. This green belt has been looked after for many years for the benefit of future generations as well as our own. The government and local councillors have promised to protect the green belt, because it is so valuable. There is no going back once an area has been concreted up!

I object strongly to a new interchange with the A3 at Burnt Common, because the traffic burden would overwhelm the current roads and infrastructure. The main roads in Send are already extremely busy, fast and excessively noisy - especially Send Road and Portsmouth Road. A huge amount of traffic between Woking, Guildford, the A3 and M25 already passes through Send. The new interchange would significantly worsen the problem.

I object to the Building of 400 houses and 7000sq metres of industrial space at Garlicks Arch. There is sufficient space on brownfield sites in the borough and this Green Belt land should be protected. There is not the infrastructure regarding roads and schools. Currently secondary school spaces are a challenge to obtain without 400 more houses in the area. Traffic I have mentioned above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/2241  **Respondent:** 10984225 / Siobhan Berry  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the local plan in East and West Horsley as I strongly disagree that land that has been protected by the green belt should then be built on.

I object to the local plan because it will completely change the character of this historical village for the worse.

I object to the local plan as the infrastructure of the village cannot support this amount of development. The drainage is already problematic and there has been no consideration for this.

I object because the doctors is always busy and it is difficult now to get an appointment and there is barely enough parking when I do go.

I object because the Raleigh School and The Howard School are already at full capacity.

I object because the local pre-school nursery is not able to provide any more than two days a week for my daughter.

I object because parking for the local shops is always a challenge, often having to drive round and round to find a space.

I object to the local plan because there is already traffic congestion in the village at peak times.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3205  Respondent: 10984321 / Paul Povey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the “historic location of Ash Green”, is inadequate and would need rewording to prevent this increased potential for coalescence.

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties
fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic
development location and provide a transition between the built up area and the countryside beyond”

- Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including
  a medieval hall house and should be amended as follows:

  “Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this
  heritage asset, including their approach from White Lane, must be protected.”

- Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to
  enable closure of the level crossing) must be competed before any development of Policy A29 commences.
- Requirement 9 fails to address the other significant transport infrastructure improvements that are required to
  cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also
  required before any development of A29 is permitted.

  1. a) The Street in Tongham
  2. b) A331/A323 intersection
  3. c) A31/White Lane junction

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend
  south of Ash Green Road and Foreman Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and
the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green
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heritage asset, including their approach from White Lane, must be protected.”

Attached documents:
1. **Policy P3 - Countryside**

Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road

- **4.3.29 Amend to:** “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”

- **4.3.30 Amend to:** “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

- **Policy P3 Amend to:** (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

4.3.29 Amend to: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”

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Policy P3 Amend to: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

**Attached documents:**
My comments on the Local Plan as it affects West Horsley are as follows:

1. The building of up to 385 homes on 4 sites is unsustainable because the schools are full, there are insufficient shops with suitable parking, little public transport, and the car park at Horsley station is full every weekday. The Local Plan offers no concrete plans for the additional infrastructure and facilities which would be needed.

2. There are already drainage problems in the Ockham Road North & Green Lane areas. Thames Water has advised that the waste water system is unlikely to be able to support the demand anticipated from the proposed developments, and the foul drainage system from West Horsley to the treatment works north of Ripley would need to be upgraded to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4061  Respondent: 10984353 / Gemma Cole  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. It is perverse that, purely because X number of homes is deemed to be needed and there are Y plots in Horsley which landowners have put forward, it is considered appropriate to move the green belt boundary just to accommodate a disproportionate number of homes irrespective of the effect on the community and its infrastructure. The whole process is arbitrary and appears to be driven purely by proposing the maximum number of homes which can be built on the land plots which Horsley landowners have put forward.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3987  Respondent: 10984385 / Julie Cameron  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
5. **Policy 25: Gosden Hill:** I object to the proposal to build a further 2,000 homes on this site because of the increased traffic flows which would result, causing more pressure on Send, Ripley and Clandon and because of the further reduction in open space and threat to the village identity of these locations.

Please ensure that this email is shown to the Planning Officer involved in the decision-making process.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/3986  **Respondent:** 10984385 / Julie Cameron  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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4. **Policy A42a: Clockbarn Nursery, Tannery Lane:** I object to the proposal to build 45 new homes on this site, where flooding is a concern. This development would also increase traffic flow in this narrow and winding lane and the volume of traffic turning onto Send Road/Send Barns Lane would be increased, where traffic congestion is already at maximum capacity.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/3985  **Respondent:** 10984385 / Julie Cameron  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
Policy A43: Garlick’s Arch (Burnt Common):

I object to this proposal to build 400 new homes and permit 7,000 sq m of industrial and warehouse use. This was not mentioned in the reg 18 document and has been added as a new proposal and therefore not been subject to consultation. This would involve a new 4-way interchange with the A3 at Burnt Common, which would adversely affect Send village. It is obvious that any change in traffic flow is disastrous for Send (as evidenced by the current road works with traffic lights taking place on the Old Woking Road B382). I object because there is no need for further housing in Send, considering the nature and amenities in the village and effect on infrastructure. Green Belt land was designated as such for a purpose, to retain areas of unspoilt countryside and respect the village community and this should not be tampered with. There has been no evidence that the additional industrial and warehousing accommodation is needed. The latest Employment Land Needs Assessment 2015 (ELNA 2015) shows a reduction of 80% in required employment floor space from the previous draft plan and any additional requirement should be housed at Slyfield. This proposal would also endanger an area of ancient woodland and is therefore inappropriate from the conversation perspective.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Policy A44: Land at Winds Ridge and Send Hill:

I object to the proposal for allowing 40 new homes and 2 travellers’ pitches on this site, as it is located on a narrow country road, single track in places, which is already under strain from admitting Send school traffic and school coaches. The turning from Send Hill into Potter’s Lane is already a danger spot, because of speed of approaching traffic along Potter’s Lane and lack of visibility. This road is unsuitable to take any further traffic stress. In addition, previous proposals have flagged the unsafe landfill waste on this site and the existence of potential hazardous landfill gas has been identified. As such, this land is not suitable for such development on health and safety grounds. This land has Green Belt status as part of the village of Send itself. Further housing in Send is unsuitable for a village within the permanent Green Belt. Green Belt land should be respected as providing unspoilt countryside between village and urban communities and its continued erosion threatens the quality of life for residents. Furthermore, I object that this proposal is newly included and was not in the regulation 18 draft. As such, there has been no proper consultation on this proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Please note this email which comprises my objections to the Guildford Local Plan 2016.

Firstly, I believe that Guildford Borough Council has not followed correct procedure, in that significant changes have been made to the plan without due consultation, especially as regards housing and road junctions. Specifically relating to Send, where I live, the highways infrastructure, forming a main link to and from the M25 and A3 and one of the few places to cross the river, is already under pressure and cannot cope with further influx of traffic. Increased traffic flow would impact adversely on village life and Send residents’ parking would be affected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8497  Respondent: 10984385 / Julie Cameron  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **Policy P2: Green Belt:** I object to the proposal to remove any land at and around Send from the Green Belt. The fundamental aim of the Green Belt is to limit urban sprawl. There is currently little open land remaining between Woking and Guildford and further encroachment would endanger the existence of Send as a village, whilst removing yet more countryside in an already pressurised rural environment. The creation of a Guildford-Woking conurbation which would emerge from this sacrificing of our Green Belt would change the nature, not only of our countryside, but also of Guildford itself, which maintains its attraction as a charming ancient market town in the 'stockbroker belt'.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/459  Respondent: 10984545 / Gina Freeman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A40

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I strongly object. You need to get some backbone and also refuse parliament. You know as well as us, that there is no parking in Horsley. Yes they will all come to Horsley too, whether you build surgery's and nursery's. Are you building a secondary school. NO. STOP KILLING OUR COUNTRY. The traffic coming off the M25 and A3, Ripley is at a standstill in rush hour. WHAT ABOUT MORE PETROL FUMES. STOP TAKING OUR GREEN BELT AND i am lead to beleive, YOU ALL TAKE BACK HANDERS TO LET THIS HAPPEN. I AGREE WITH WHAT IS BEING SAID. THERE WILL BE MORE ACCIDENTS, AS PEOPLE TAKE MORE RISKS IN TRAFFIC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY D2 Sustainable design, construction and energy - I OBJECT. The emphasis on energy and waste hierarchies and reduction of carbon emissions as part of building design are welcomed. However, the emphasis on CCHP (Combined Cooling Heating and Power) and communal heating networks seems curious – no such networks are currently locally available. There is an element of “Greenwashing” – the imposition of aspirational environmental targets while ignoring the simple fact that building dormitory towns is environmentally unsustainable. These all require increased car use and will lead to increased congestion and so air pollution and higher carbon dioxide emissions and a few solar panels on roofs will not compensate for the considerable environmental cost.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9215  Respondent: 10985057 / Anthony Parker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D3 Historic environment – I PART SUPPORT, BUT PART OBJECT The policy appears reasonable. However, conserving and enhancing the historic environment may be damaged by supporting ancillary development. In historic locations (Chilworth Gunpowder Mills, the NT sites like Clandon Park or Hatchlands, Guildford Castle, Guildford Museum etc.) this policy needs to have an overriding emphasis on protection rather than supporting development. The emphasis on supporting some development – in the context of an authority that has already set in place aggressive reviews of Guildford Museum and the Electric Theatre – should be viewed with some caution. The justification seems reasonable but it must be noted that it is the wording of the policy, rather than the associated explanation, that must be key.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9216  Respondent: 10985057 / Anthony Parker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY D4 Development in urban areas and inset villages – I OBJECT. There are effectively two separate parts to this policy, both are flawed, and in the case on insetting, fatally flawed. In the case of urban development there are numerous flaws, including:

- The plan envisages that 40% of homes built will be affordable, but this does not provide any accommodation for low paid workers, for example, those on the minimum wage, who cannot afford to buy “affordable” homes, nor can they pay the so-called “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low paid workers such as those employed in the retail, warehousing and distribution sectors.
- The number of homes planned in the urban area is too low – there is a need for regeneration in some areas, but this is ignored and instead the plan concentrates on building homes on green field sites, which does not meet the needs for housing within the town, especially with the centre. This is not a sustainable policy as building outside the town has a disproportionate effect on road traffic.
- The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in long term decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9202  Respondent: 10985057 / Anthony Parker  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E1 Meeting employment needs – I OBJECT because

- the evidence base is unreliable
- there is unclear differentiation between B class uses
- only high added-value business uses are desirable, not low grade, low employment warehousing which is land hungry
- industrial and commercial businesses must be concentrated in the urban area, or existing business parks (e.g. Slyfield) not in the rural environment which the infrastructure is unable to support
- the rural environment must support micro or high tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9203  Respondent: 10985057 / Anthony Parker  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E2 Location for new employment floor space – I OBJECT. I believe that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre. I do not support the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9204  Respondent: 10985057 / Anthony Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E3 Maintaining employment capacity and improving employment floorspace – I OBJECT. I do not support the policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land and is contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9206  Respondent: 10985057 / Anthony Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY E4 Surrey Research Park – I OBJECT. I support the maintenance of research, development and design activities, in any science, including social science, which is complementary to the activities of the University of Surrey at the Surrey Research Park. I do not, however, believe that there is a need to expand the Research Park into a larger Business Park. I believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University. I believe that B1b should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. I do not believe the inclusion of B1c uses is appropriate or necessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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POLICY E5 Rural economy – I OBJECT. Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism, which mean that local people should be consulted – and heeded (not ignored!). Villages need protecting both in terms of design and in terms of scale. Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This is disregarding the responses from the previous consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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POLICY E6 The leisure and visitor experience – I OBJECT. Tourism and visitors do not depend on new visitor “attractions”. Overdevelopment of countryside is a risk. Surrounded by the natural beauty of the Surrey Hills, Guildford is distinguished as an historic county town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back. Guildford would be wise to model itself on other historic towns like Bath, Chester and York. The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town. Guildford is the historic “Gateway to the Surrey Hills” has far more potential than
Guildford being a stereotypical centre found anywhere around London. The countryside can offer high quality tourism – including cycling, National Trust sites, open countryside and cultural events including theatre and opera – which is lucrative. This is not recognised fully.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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POLICY E7 Guildford Town Centre – I OBJECT. There should be much more residential use of the town centre. There is limited need for further retail, which will disadvantage existing retailers as well as using valuable land inefficiently. Existing niche retailers should be supported, but this does not mean further retail expansion, which could be counterproductive. There is an urgent need for a brownfield register and to focus on brownfield redevelopment before considering development outside the existing urban area. CIL strategy must promote brownfield redevelopment. Guildford should strive for high quality definition making it a great centre for people to live in and visit. It would be a great mistake if Guildford were to opt for large impersonal department stores and dull high street chain stores at the expense of exploiting its uniqueness and character, which would afford greater benefits.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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POLICY E8 District centres – I PART SUPPORT, BUT PART OBJECT I think it is appropriate that these three district centres should support development consistent with the scale and function of the local centre. I think it is appropriate not to approve planning applications for main town centre uses over 100 sq m outside district centres – although this policy could and should be more clearly articulated. I do NOT support consideration of sites on the edge of district centres for town centre uses.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>POLICY E9 Local centres – I OBJECT. I do not think that retail development adjacent to the 6 rural centres is appropriate, nor sites on the edge of designated centres.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>Homes for all – I OBJECT. The housing mix is based on the assumptions set out in the Strategic Housing Market Assessment (SHMA) which has not been scrutinised or evaluated and so I object overall. I support high density development in the urban area. Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up suitable family accommodation in the urban area. Guildford borough has already a higher proportion of traveller sites than most comparable boroughs and this should be taken into account when evaluating need for travellers.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</td>
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Affordable homes – I OBJECT. “Affordable” homes, under national definitions, means homes which are sold or rented at 80% of market value. Even at 70% rented this means that these homes will not be cheap, and starter homes will not be made available for local people. There is a viability clause (4.2.40) which means that in practice this could be unenforceable. We would be losing countryside for no local benefit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9194  Respondent: 10985057 / Anthony Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Rural Exception Homes – I OBJECT. This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (this includes agricultural land and the AONB). These homes could be homes for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development). This policy means building anywhere, and ignoring all historic planning restrictions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9217  Respondent: 10985057 / Anthony Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY I1 Infrastructure and delivery – I OBJECT. Various aspects of Infrastructure are acknowledged as congested, inadequate for the existing population and not able to accommodate much growth.

However, greenfield sites – requiring heavy infrastructure investment – are targeted in order to generate CIL income for the council. This is not sensible. The current draft CIL scale also encourages development on greenfield sites rather than brownfield.

The Council’s methodology assessing traffic and roads infrastructure needs is inadequate. It identifies only the tip of the iceberg in terms of existing congestion. Looking at local traffic situations around the Borough it becomes clear that the schemes proposed will not solve existing congestion and the local road network has not been given sufficient consideration.
Some proposed locations would require highway schemes that involve demolition of property and road-widening in residential areas to solve the resultant congestion. The A3 improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place. These detailed investigations are being deferred until the planning application stage and will be left to developers to prepare. If a site then proves to be unsustainable its Green Belt protection will have been lost for no reason and unsuitable development will take place by a more insidious process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9218  Respondent: 10985057 / Anthony Parker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY I2 Supporting the Department of Transport’s “Road Investment Strategy” – I OBJECT.

This policy is concerned only with the strategic road network – the A3 and M25 for which the responsibility and decision-making lies with Highways England (“HE”). It is only reasonable that the council will work closely with HE to ensure that the Local Plan does not utilise land in a way that limit the scope for future improvements. However, the proposals for the A3 are undecided and the council has suggested a very expensive tunnel proposal that, even if HE decided to go ahead with it, is unlikely to be delivered until the end of the plan period. Less expensive alternative A3 improvements would not be delivered before implementation of the current draft Local Plan and would deliver a massive growth in traffic. The road improvements are likely to lead to massive disruption to traffic during the construction phase on top of an already overloaded road network. It would be folly to make matters worse by committing to a massive housing number and the only logical conclusion is that a very significant traffic constraint should be applied to the OAN for this Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9219  Respondent: 10985057 / Anthony Parker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY I3 Sustainable transport for new developments – I OBJECT. I support the concept of sustainable transport but object on the grounds that the practicalities have not been properly considered, including:

- It is not sustainable to build dormitory towns and call them sustainable.
- Not everyone can cycle all the time.
- How can large developments outside the town centre maximise sustainable travel? This is a matter for the planning process - the further from the town centre, the less sustainable the development will be.
- Reliance on cycling discriminates against vulnerable members of the community. How can the disabled, those with small children, or the very old, or the infirm, or those who are ill, cycle outside the town in order to commute, or even inside the town? Only some people cycle – and Guildford has some steep hills, especially going out of town. Park and rides are slow – how can those with a 3 hour commute add 1 hour to their journey from using park and rides?
- The only sustainable mechanism for new developments is to have them in the town centre close to the railway and the main shopping links where a “hoppa bus” can provide satisfactory links for those who cannot walk or cycle.
- While I welcome the intention to encourage rail travel by adding two new stations (subject to negotiation with Network Rail) there could unintended consequences.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9220  Respondent: 10985057 / Anthony Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY I4 Green and Blue infrastructure – I OBJECT.

The Policy shows concern for conserving and enhancing biodiversity, which is welcome. I also note and welcome the intention to extend the principle beyond Biodiversity Opportunity Areas. However the current plan to build on large areas of countryside and to inset villages will have the opposite effect. The Policy appears therefore to be a box ticking exercise with no real teeth to it. There is no mention of the value of wildlife gardening to biodiversity or the important role that larger gardens play in a village setting.

There is no mention of the impact of the plan on food production, or monitoring the loss of agricultural land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9196  Respondent: 10985057 / Anthony Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1
Surrey Hills Area of Outstanding Natural Beauty – I OBJECT. This policy is much weaker than previous protection. It is dependent on the Surrey Hills Management Plan. Note that this welcomes housing development. The Surrey Hills needs much more substantial protection. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9197  Respondent: 10985057 / Anthony Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Green Belt – I OBJECT. I object to the insetting of 14 villages from the Green Belt, and the proposal that infilling is acceptable within a further 12 villages within the Green Belt. I am concerned that “infilling” is also proposed outside the settlement boundaries of 11 further villages. Essentially, all the villages within the Green Belt are now vulnerable to extensive further development. Green Belt is supposed to be protected as a matter of national and local policy, but this policy seeks to justify development in a supposedly protected area, in breach of local manifesto commitments and contrary to previous responses to public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9198  Respondent: 10985057 / Anthony Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Answer (if comment is on questions 1-7 of the questionnaire): ()
Countryside (i.e. countryside beyond the Green Belt) – I OBJECT. This seems more protective – as a policy – than the proposals for the AONB and the Green Belt, which is anomalous. I am not in favour of building on this area – the brownfield areas within the urban area are sufficient to meet all reasonable housing targets. There should be no need to build on any green fields if brownfield (previously developed) land is used efficiently. (That does not mean garden-grabbing!).

However, I do not think this area justifies stronger policy protection than any other part of the borough. This policy refers to the area of countryside near Ash and Tongham (see paragraph 4.3.28). The fact that the current and previous Council Leaders represent this area should not give it preferential status:

“we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”. Green Belt and AONB areas should – by definition - have higher levels of protection than non-Green Belt areas, which is not the case with this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9199  Respondent: 10985057 / Anthony Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Flood risk and water source protection zones – I OBJECT. There are aspects of this policy which are acceptable; it is sensible to protect groundwater source protection zones, provided that the maps are accurate. However, urban development on hard standing does not create increased flood risk, especially where there is the capacity for improved flood resistance measures to be included in the design. Sites such as the Arriva bus depot, on the River Wey bank, are potential high value brownfield land which may not be used for housing because of this policy. The footprint of existing buildings should not be the limit of future development, but the extent of existing hard standing. Tarmac and concrete do not act as functional floodplain, but some land with hard standing close to the river, within the town centre and within easy walking distance of the train station, provides an exciting opportunity for real urban regeneration which could protect the surrounding countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9201  Respondent: 10985057 / Anthony Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Thames Basin Heath Special Protection Areas – I OBJECT. This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small and negligible as to be meaningless. SANG (Suitable Alternative Natural Greenspace) is not beneficial; the sites identified or targeted are already green space. To create SANG is just using agricultural or wooded land as recreation land in order to justify building on other green spaces. There is no actual increase in environmental protection; it is a policy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds - must ensure that it is not using land which is adjacent to the special protection areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Presumption in favour of sustainable development – I OBJECT. While this wording is based on the National Planning Policy Framework (NPPF) – which is binding - this policy fails to recognise that development in rural areas, with inadequate transport and other infrastructure, cannot cope with the proposed scale of development. It is unsustainable. This should represent an absolute constraint on development and that level of constraint should be spelled out.</td>
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<td>Borough Wide Strategy – I OBJECT. 13,860 homes are proposed. This number has not been scrutinised by councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden. It is not reasonable to produce unsubstantiated numbers in order to justify major structural change in a widely protected area (89% Green Belt, 44% AONB, approx. 75% protected by SPA).</td>
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<td>It is inappropriate to allocate this housing number, either over the plan period OR across projected sites, when the number itself is unsubstantiated. External consultants and members of the public have provided detailed criticisms of the model. IF the housing number were substantially lower, and only met housing need, there would be no need to build on Green Belt or open countryside.</td>
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The number of homes proposed, plus existing planning permission, plus expected “windfall” sites, exceeds 13,860. Guildford residents would not accept building homes on open countryside to meet Woking’s designated “need” but this seems to be implied.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2737  Respondent: 10985153 / Denise Liparoto  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley South

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The green belt was put in place to prevent urban sprawl and to prevent homogenising rural communities.

NO COMPELLING REASON HAS BEEN GIVEN FOR TAKING THE HORSLEYS OUT OF THE GREEN BELT. I VIOLENTLY OBJECT TO THIS PROPOSAL.

The Horsleys has very distinct character which will be ruined by the granting of planning permission for all of the projects that have been proposed which is a sort of opening the floodgates approach incoming on all sides.

I object to the size of the development at Wisley airfield and its resultant effect on traffic and services in the area.

I object to the proposed development of The Thatchers site again for its affect on traffic putting pressure on a double bend both off which there are already 3 road turnings plus the turning for the development itself and the petrol station. Apart from the developer who benefits no doubt there will be very few houses that address the issues of what is needed locally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2668  Respondent: 10986209 / Richard Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
  6. The lack of suitable public The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M2S/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.
• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) -
where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of
consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning
application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning
Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also
been raised by a broad number of authoritative sources across the UK, including Highways England, Thames
Water, NATS and the Environment Agency.
• I would point out that the number of new homes has been based on pre-Brexit projections for economic and
population growth, including migration which now needs to be revised downwards, possibly quite seriously.
• Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs
and organic growth. The plan's commitment to build housing across the Guildford countryside will
mean either major infrastructure investment, which no one will believe will happen and for which there are no
funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication
services.
• Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in
absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these
communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows),
Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2295  Respondent: 10986209 / Richard Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

When I moved to Woodfields, School Lane, Ockham, 31 years ago, there was talk about developing the airfield; a
neighbour who moved here 40 years ago told me that proposals to develop the site were being discussed even then. At the
last Council meeting I attended the most recent proposals were rejected by the Councillors **UNANIMOUSLY!** But were
still left in the Local Plan. So what is it that you don't get? For the following reasons that you and I are sick to death of
reading and writing about the site is **UNSUITABLE** for development and this has been recognised by the planning
authorities for 40 years that I know of!

I require confirmation that all of these comments together with all my previous comments are passed to the Inspector. I
reserve my right to appear at the inquiry and present my evidence.

I continue to object to the inclusion of policy A35, Three Farms Meadows, Wisley Airfield, or whatever you like to call it,
in the draft Local Plan for many reasons including:

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because
of the constraints on the site and the physical location.
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most
congested junction in the country (J10)
4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc).

5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.

6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.

7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   - The associated traffic increase from the RHS has not been taken into account.
   - The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account

8. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.

9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.

10. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.

11. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”.

12. Opportunity (3) should be common to all sites and is not unique to this site.

13. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.

14. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

15. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16).

16. I object to the removal of additional 3.1 ha from the green belt without any justification.

17. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.

18. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.

19. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

20. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consulters.

21. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

22. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

23. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

24. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

25. I object to the extension of the plan period by 1 year as it has not been identified as a major change.

26. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

27. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

28. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

29. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

30. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

31. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

32. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.
33. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the 
damage caused by nitrogen deposition and high pollution levels.

34. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 
12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of 
a number of glaring examples of why the plan is not sound.

35. I object to the quantity of space allocated for retail in the town centre. This could be much better used for 
residential development. I particularly object to the reliance on the Carter Jonas study update 2017 which 
includes “demand” for retail space from companies already in administration.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPS16/4807</th>
<th>Respondent:</th>
<th>10986241 / Michael Dawson</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A15</td>
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This is currently a site designated as Protected Open Space. Therefore it is not accurate to describe the existing land use in 
your description on page 156 of the proposed sites section as ‘open space and residential properties’ although it is the case 
that the Cathedral was originally allowed to build 6 houses for their staff in the south-east corner of this protected open 
space site in what is now called Cathedral Close with an additional house built later to make it 7 houses. This development 
and subsequent additions were opposed because of the protected open space status and because some of the original houses 
were built across a public footpath.

To suggest that this site should be redesignated as C3 Housing for approximately 100 homes is inappropriate for a number 
of reasons. Firstly this site is the setting for a Grade II Listed Building – the Cathedral - and the houses will not only 
potentially obscure this listed building but because of its elevation will be visible from many other parts of Guildford 
particularly in the south and east. This is already the case when viewing the Cathedral from the north.

Secondly the site is bounded by an ancient tithe hedge on its southern boundary with Ridgemount and Alresford Road 
which needs listing in the requirements section of your proposed sites section if this proposal was to be accepted.

Thirdly the site has a history of drainage problems and subsidence so approximately 100 homes will require expensive deep 
piling and will impact on the flooding problems that have been experienced in Ridgemount in recent years.

Finally approximately 100 homes will generate additional traffic in the area. Ridgemount and Alresford Road are minor 
routes with limited pedestrian provision on one side only in what is currently a semi-rural environment and would not be 
able to cope with the traffic likely to be generated by this proposal and of course this traffic would feed into the already 
congested Madrid Road and Guildford Park Road and subsequently Guildford Town centre.

In summary this site should remain designated as protected open space with the small number of cathedral houses already 
built. While the limit of approximately 100 homes is less than the designation of 175 houses in the 2014 Local Plan 
revision that your new draft replaces it is still inappropriate to designate this site as C3 Housing and I ask for this to be 
reconsidered and withdrawn.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4808  Respondent: 10986241 / Michael Dawson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to register my strong objection to the plans to develop the above site. This will add to the traffic chaos which already exists and destroy areas of Green Belt and AONB. This project has been driven by the University of Surrey who should be made to carry out the already existing planning they have been granted to provide student and staff accommodation, thus relieving the housing situation in the town. There is absolutely no reason why they should be allowed to pursue these plans which is clearly for monetary gain and will cause irreparable damage and destruction to the beautiful landscape of this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1300  Respondent: 10986241 / Michael Dawson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A15

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing as requested in response to the changes that you are proposing to make to the Proposed Submission Local Plan: Strategy and Sites (2017). In particular I wish to make the following comments on the Guildford Town Centre Site Allocation A15 Land at Guildford Cathedral, Alresford Road, Guildford listed on page 142 and detailed on pages 176 and 177.

I welcome the addition of the word 'Design' in the third point of Key Consideration 3 and the addition of point 6 'Mature hedge (running along Ridgemount and Alresford Road)' in Key Considerations on page 176 although I note that these additions are not identified as such.

However, I am unhappy with the new wording of Requirements point 4 on page 176 - 'A holistic approach to the landscaping of the site to include no unacceptable impact on existing trees and mature hedges of significance'. The original wording - 'Protect existing trees and mature hedges of significance' (a wording not in the earlier submission) is more
precise and doesn't rely on an interpretation of the word unacceptable. I presume the use of the words 'of significance' includes the need to protect trees with Tree Preservation Orders on this site and to protect the Tithe Hedge bounding the site which should be protected under the Hedgerow Regulations of 1997 as it has a continuous length exceeding 20 metres, has existed for 30 years or more and satisfies at least one of the criteria listed in Part II of Schedule 1 of the Hedgerow Regulations 1997? The new wording should not replace the existing which should be strengthened and clarified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:
- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt increase tail backs on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas.
ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<th>Comment ID: SQLP16/1764</th>
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<th>Agent: Vail Williams LLP (Jane Terry)</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

Employment Lands Needs Assessment 2015

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SLP16/1767  Respondent: 10986657 / MC Nominees Ltd  Agent: Vail Williams LLP (Jane Terry)
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SLP16/1768  Respondent: 10986657 / MC Nominees Ltd  Agent: Vail Williams LLP (Jane Terry)
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

These representations relate to the strategic delivery of employment within the draft Local Plan and as such it is necessary that sufficient debate takes place at the Examination.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1246  Respondent: 10986689 / Richard Harris  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the proposed Infrastructure Schedule (Appendix C)

   The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1247  Respondent: 10986689 / Richard Harris  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

   • The “objectively assessed need” figure of 693 homes a year is too high.
   • A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
   • The current SHMA inflates the proposed housing figure due to
     ◦ failure to correct for errors in the historical data for international migration flows,
     ◦ issues with the way it considers students and affordability and
     ◦ flaws in the method for estimating the number of homes needed to support job growth.
   • It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/2268</th>
<th>Respondent: 10986689 / Richard Harris</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.
The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2269  Respondent: 10986689 / Richard Harris  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.
National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<td>1. I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)</td>
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<tr>
<td>I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.</td>
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<tr>
<td>The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.</td>
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<td>1. I OBJECT to the sustainable employment policy (Policy E1)</td>
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<td>If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.</td>
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<td>The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. POLICY H3 – Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

1. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>1. I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)</td>
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<td>There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 &amp; M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.</td>
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<td>1. I OBJECT to poor air quality concerns (Policy I3)</td>
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<td>Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.  I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4986  Respondent: 10986689 / Richard Harris  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.  I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the
flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Borough Wide Strategy (Policy S2)

   a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

   1. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

   2. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

   These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

   It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

   The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

   What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.

6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.

7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are ever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.
18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site.

2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.

3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2872  Respondent: 10986689 / Richard Harris  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/548  Respondent: 10986689 / Richard Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/740  Respondent: 10987137 / Susan Wong  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
5. The infrastructure information is not very detailed. Will the area be able to attract enough people to work here?

[...]

7. A tunnel is suggested. An excellent idea considering the number of accidents on the A3 as it passes by Guildford and the area. But surely a decision and action are needed on a tunnel before so many houses are built. Changes may be made to the road system which with a tunnel may not be needed. Money will have been spent unnecessarily.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/8298  **Respondent:** 10987137 / Susan Wong  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Many of the proposed changes will lead to more stressful lives

Much of the pleasure we get from living in Burpham will be lost.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/2410  **Respondent:** 10987137 / Susan Wong  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Some changes to the roads are proposed but there will still be much more traffic in the Burpham area which already has serious problems. Will the new people enjoy living here when they discover it takes an extraordinary long time to get through Merrow and Burpham with all the clogged up roads? Some roads can be widened but it often causes a problem when the traffic is funnelled in to narrower roads with less traffic lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the 2016 Draft Local Plan for the following reasons

1. Some Green Belt will be lost. The purpose of the Green Belt is to protect areas from development like that proposed particularly the Gosden Hill proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. Do we really need the number of houses proposed - 693 per year - considerably more than the number given in 2012 of 322? Lots of people might want to live in this area but can they afford it?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. Do we really need the number of houses proposed - 693 per year - considerably more than the number given in 2012 of 322? Lots of people might want to live in this area but can they afford it?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. More than 40% of the houses proposed will be within a few miles of Burpham. It does not seem fair for Burpham to be having a disproportionate share of new housing with the associated problems and the upheaval when the building takes place and afterwards.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/562  Respondent: 10987137 / Susan Wong  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The consultation period is not very long. It being in the summer many people will be away and miss the opportunity to comment on the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4056  Respondent: 10987137 / Susan Wong  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A25 Gosden Hill

Allocation

The number of homes has not been changed just stated in a slightly different way implying that the number has changed “Approximately 2000 homes of which a minimum of 1700 homes will be delivered within the plan period”. There will also be schools, businesses, shops, a station and a Park and Ride all with vehicles wanting to use the roads.

Infrastructure

The proposed 2 way junction for Gosden Hill will lead to even more grid lock than is currently experienced in Burpham. All traffic wanting to access the northbound A3 or Guildford will have to travel through Burpham. Local traffic wanting to access the new A3 southbound slip road will have to travel through Burpham. The traffic has already increased with the new Aldi store.
When there is a problem on the A3, Burpham grinds to a halt and all those vehicles are giving off fumes affecting the health of Burpham residents. It is proposed the present 1 way 2 lane slip road off the A3 at Burpham becomes 2 way. What will happen when there is an accident or breakdown – gridlock. Other proposals being considered – Slyfield, Clay Lane Link Road and others - will all add to the traffic in Burpham.

Access to Gosden Hill Village

There is only one access/egress to the proposed development which is unsafe. If there is an accident or breakdown blocking the road at the roundabout there could be a very serious problem as emergency vehicles may not be able to get through. There is mention of a through route in the Opportunities section but no sign of the location of this route or evidence of a protected route.

Sustainable Movement Corridor

The developer is required to provide the eastern route section of the Sustainable Movement Corridor on the site and make a contribution to delivering the eastern route section on the Local Road Network. The local roads already have increasing times and occasions of gridlock. How can increasing the traffic by the proposed amounts be provided on roads where there is only room for 2 lanes? Has anyone actually visited or surveyed the area?

A3 Tunnel

In the Guildford borough Transport Strategy 2017 there are references to the A3 Guildford Tunnel under the Aspirations heading. Has any thought been given to the land needed for a tunnel? Gosden Hill is the logical choice and should be protected not built on.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Policy H1

Surrey University has planning permissions to build more accommodation for its students. If used this would release affordable homes in the town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt

Much of the development will be on Green Belt. This Green Belt currently performs all the requirements of Green Belt land including preventing neighbouring towns merging together and assisting in safeguarding the countryside from encroachment. The NPPF paragraphs 87-89 require there to be exceptionable circumstances before building can be permitted. However over 50% of the total proposed new housing development will be in Green Belt land – how can this be exceptionable? Clandon and Guildford will only be separated by a very narrow strip of land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2180  Respondent: 10987137 / Susan Wong  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S2

I accept that we need more homes in the area but the amended number is still very high. An independent analysis by a national expert stated that an annual build of 404 houses giving a total of 7676 houses over the period of the plan would be sufficient for Guildford’s needs. It is still higher than all the other boroughs in the area (SCC figures). GBC has not explained how it arrived at its figures.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12687  Respondent: 10987393 / Sharon Fredriksson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
My comments on the Guildford Local Plan are as follows:

**The Green Belt**

The Metropolitan Green Belt is one of the best legacies our forefathers left us and needs upholding, respecting and maintaining AS IT IS TODAY in order that we, and future generations, may benefit physically, emotionally and mentally from enjoying the expanse of fresh air which is hugely enhanced by the greenery around us.

Build houses elsewhere - not within the Green Belt!

The Horsleys (East Horsley and West Horsley) must absolutely remain within the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/3766  **Respondent:** 10987585 / Jennifer Dane  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I am writing to OBJECT to the Local Plan 2016, I have grave concerns regarding the number of houses that are being proposed. In particular the village of West Horsley, where I live. The increase in houses of up to 35%, which seems to be greater than any other borough. With an infrastructure that finds it difficult to cope at present, full schools, terrible roads and drainage, doctor's surgeries unable to manage it's current patient base( I had experience of that just last week), station car park full.

I Object strongly to the villages in the Plan being taken out of the Green Belt, which would totally change the nature of our area not only for ourselves but for future generations. Once it has been removed it can never be replaced.

I also Object to the development of over a 2000 house village at Ockham, apart from totally ruining Ockham it will have a huge impact on the Horsley villages, the roads alone would not be able to cope with such a huge influx of cars.

I Object to boundary extensions of the Settlement areas within the Horsley's. There does not seem to be any reasoning behind this.

Therefore in conclusion I most strongly Object to the Local Plan and find it so upsetting that West Horsley could no longer be classed as a village, the main reason I moved here nearly 20yrs ago from London.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/3025  **Respondent:** 10987745 / Ian Pigram  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object on evidence based grounds to the increase in housing around Send because the Employment Land Needs Assessment of 2015 demonstrated a significant (80%) reduction in housing needs from the 2013 ELNA. The design premiss for road infrastructure planning is therefore similarly flawed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3026  Respondent: 10987745 / Ian Pigram  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Send being be removed from Green Belt, a valuable and irreplaceable buffer between Guildford and Woking which provides extensive recreational facilities. Any planning ideas such as the proposals for Send completely neglect the whole idea of Green Belt which is intended to be permanent as required by the National Planning Policy Framework. There are no special circumstances to justify this irreversible move. Brown field sites should always be used, such as those at Slyfield. Our children and children's children will thank us if we maintain an intact Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6113  Respondent: 10987745 / Ian Pigram  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the development at Garlick's Arch, Burnt Common on two counts; that there is no demonstrated need for the extra housing or industrial and warehousing (ideal for brown field sites such as Slyfield) space following the ELNA in 2015; that this site contains ancient woodland, our richest land based habitat, which need proper protection, not destruction.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6111  Respondent: 10987745 / Ian Pigram  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the new four-way A3 interchange at Burnt Common, not only from using the unsound ELNA from 2013 rather than the significantly reduced housing needs from the 2015 ELNA as input to transport planning, but that this would result in a major disaster for traffic through Send and Burnt Common. Connection at Burnt Common would attract traffic from further afield to join and leave the A3 (and the M25) from both north (e.g. Woking) and south. Pressure on the local transport infrastructure would be significant, with further degraded traffic flow for local people.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1488  Respondent: 10987745 / Ian Pigram  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all the proposed site plans for Send because they are based on unsound legal process, i.e. they were not included in the previous consultation in 2014. Regulation 18 should have been used rather than Regulation 19.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4973  Respondent: 10987777 / Justin Travers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

** I object to the figure of 693 houses per annum in the borough being too high (Appendix D) GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
** I object to the inclusion of the land at Garlicks Arch, Send Marsh/Burnt Common and Ripley (A43) Garlick's Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the the Draft Local Plan Infrastructure schedule does not provide for this site at all.

** I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)
Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

** I object to the proposed Infrastructure Schedule (Appendix C) There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

### Comment ID: PSLPS16/4400  ** Respondent: 10987841 / Marion Bastable  ** Agent:

** Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43**

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

### Comment ID: PSLPS16/4401  ** Respondent: 10987841 / Marion Bastable  ** Agent:

** Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43**

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

### Comment ID: PSLPS16/4402  ** Respondent: 10987841 / Marion Bastable  ** Agent:

** Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43**

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
** I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5) The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

** I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a) This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

** I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1) This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<td><strong>I object to the lack of proper infrastructure planning for sites (Policy I1) The current and existing services are overstretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools?</strong></td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td><strong>I object to poor air quality concerns (Policy 13) The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.</strong></td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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|--------------------------|----------------------------------------|--------|--------------------------------------------------------------------------------|
** I object to the congestion that development will cause to the trunk roads A3/M25 (Policy12) Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place. Please record these objections individually against the relevant sections of the plan and ensure that they are submitted to the Planning Inspectorate.

** I object to not protecting the Green Belt (Policy P2) I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43) There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 10987841 / Marion Bastable</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
** I object to development in areas at risk of flooding (Policy P4) The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<th>Comment ID: PSLPP16/9527</th>
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I object to the 2016 draft local plan for the following reasons: ** I object to the local plan as the development proposed is not sustainable (Policy S1) The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

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** I object to the Borough Wide Strategy (Policy S2) There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPA16/3700</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability and
- flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.
The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2119  Respondent: 10987905 / Marika Chandler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as III as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

   1. POLICY A25 - Gosden Hill Farm
I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 – 2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highecotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.
The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Clandon</td>
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</table>
I live on the Street on West Clandon on the very dangerous bend opposite the church. When I exit onto the road it is completely blind in both directions and therefore extremely dangerous. The road is already an extremely busy rat run through to the A3 and any development that increases the number of cars on the road in the area will make it more dangerous. I also have to walk my children along this road to the recreation ground and in places the path is barely wide enough for us and I have seen trucks and buses mount the curb to pass in the narrower places. I moved to West Clandon from London 2 1/2 years ago. I made the choice to move here to raise my children in a rural environment, in a village and to get away from urbanisation. One of the reasons I chose West Clandon is because it is protected from development by the green belt and I felt that West Clandon and the other small villages around here, that will be adversely effected by the plan, would remain as small villages. I therefore feel that the proposed plan will degrade the nature and amenity of the villages that will be effected and I feel that the Council have a duty of care to me and my family to not go ahead with development that will increase traffic on the roads through my village and make it more dangerous to live here and degrade the environment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4231  Respondent: 10987905 / Marika Chandler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

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- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

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The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

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I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

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I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council’s eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as a A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.
National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPS16/7033</th>
<th>Respondent:</th>
<th>10987905 / Marika Chandler</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).
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It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7034  Respondent: 10987905 / Marika Chandler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I OBJECT to Policy D3 - Historic environment</td>
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<td>I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)</td>
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<tr>
<td>I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.</td>
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<td>The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.</td>
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| Comment ID: PSLPP16/9036 | Respondent: 10987905 / Marika Chandler | Agent: |
I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8979  Respondent: 10987905 / Marika Chandler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the
south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I OBJECT to the location for new employment floorspace (Policy E2)</td>
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<tr>
<td>I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.</td>
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<td>Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.</td>
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<td>There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15612  Respondent: 10987905 / Marika Chandler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</td>
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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.
In addition, the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000, the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15611  Respondent: 10987905 / Marika Chandler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ()

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H3 – Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9001  Respondent: 10987905 / Marika Chandler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ()

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15609  Respondent: 10987905 / Marika Chandler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15601  Respondent: 10987905 / Marika Chandler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15602</th>
<th>Respondent: 10987905 / Marika Chandler</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.
The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8964  Respondent: 10987905 / Marika Chandler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.
The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper account of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.
It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/1233  **Respondent:** 10987905 / Marika Chandler  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1243  Respondent: 10987905 / Marika Chandler  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together.
with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

5. GBCH has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation

6. GBCH has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation

7. GBCH has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound

8. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018

9. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars

10. The GBCH proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham

11. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework

12. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

13. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

14. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens

15. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

16. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

17. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

18. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

19. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.
The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SLP16/1248  Respondent: 10987905 / Marika Chandler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4632  Respondent: 10987905 / Marika Chandler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4633  Respondent: 10987905 / Marika Chandler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development involving cyclists as a result of the development proposed under the local plan.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

7. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

6. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

5. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of infrastructure requirements and that the projects identified will be implemented when required, if at all.
20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357 sq m in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607 sq m of B use class floorspace to come forward. This figure comprises a net loss of 4,750 sq m of B1a use class floorspace and a net gain of 38,357 sq m in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357 sq m.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp171/3070</th>
<th>Respondent: 10987905 / Marika Chandler</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/607  Respondent: 10987905 / Marika Chandler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/354  Respondent: 10988321 / Ewan Gordon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A21

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I would be opposed to any attempt to access this proposed development through the Broadacres / oakfields estate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/796  Respondent: 10988417 / Barry & Renate Grossmith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

After reading a summary of what the New Local Plan contains particularly in respect of West and East Horsley one can only conclude that Guildford Borough Council's planners lack integrity and professionalism.

Integrity is certainly lacking when a wise and longstanding environmental planning law is revoked for the sake of expediency when better alternatives are at hand. This of course refers to the removal of Green Belt status. Such is the stuff of Alice in Wonderland: "Green Belt only means Green Belt when I say it does".

The same applies when plans are made to turn two villages into one suburban bubble in the already densely populated south east England in spite of the fact that the local and surrounding infrastructure is already overloaded. To any casual observer it is obvious that Ockham Road South is unfit for the purpose of serving the volume of car traffic, cyclists, pedestrians, HGVs and school buses. The railway bridge has recently undergone extensive repairs as the result of HGVs driving into its low arch. The road is nothing more than a converted horse and cart track. Its width for much of its length and that of its one narrow footpath discourages its use by pedestrians and cyclists at a time when these means of getting from A to B should be positively encouraged. 'Access only' restriction for HGV’s is apparently not an option because this restriction cannot apply to a B road. Now isn’t that strange? The status of Green Belt can be revoked at the drop of a hat but B road status is sacrosanct. Why is that?

As residents of [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998], a block of ten flats in the middle of village of East Horsley, we see daily the inadequacies of the access road to the public car park behind Station Parade. HGVs emptying the recycling bins or delivering goods to the shops are colliding with and causing damage to our boundary fence and the roadside kerb because there is inadequate turning circle for modern HGVs. The recycling centre at the entrance to the car park already lacks the capacity to deal with the volume of waste material deposited by local residents and incidentally the local shops. The result when the bins are overflowing - almost a weekly occurrence - takes on the appearance of a backstreet in Calcutta minus the cows. All measures taken by the relevant department at GBC over the last 5 years resulting from complaints by our residents’ company have not resolved either of the these health and safety problems.

Using the search facility provided on your Local Plan website and entering the words 'demographic analysis' we have failed to find any reference to such analysis. So for whom is building land required? The number of over-65s has risen by more that 20% in a decade and research would tell you that it is difficult to find high quality flats for local elderly people who want to downsize. The speculative builder who built Maranello House in 2003/4 thought his target group were young upwardly mobile professionals - how wrong can you get? He certainly hadn’t done his market research. The ten luxury flats here were soon snapped up by local residents who wanted to downsize because of their advancing years. And currently when one of these flats comes on the market it is likely to be the subject of gazumping because of high demand and limited supply. Such purchasers want to stay local to retain their social contacts within the local community and be in a location which is within walking distance of shops and local amenities. Unfortunately it is still clear that too many family homes are
lived in by single seniors who cannot find flats of sufficient high standards and attractiveness. These are the equivalent of NHS bed blockers.

The recent example of the most inefficient use of land development in East Horsley is the one on the corner of Cobham Rise and Station Approach. Again it is clear that the speculative builder was obviously unaware of the market. The resulting two-storey terraced houses on two floors were slow in selling. That land was not developed to its full potential either in terms of unit numbers, the specification and suitability for local down-sizers who require living units on one level = flats with lift access. It is clear that neither the speculative builder nor Guildford Borough Council planners were aware of this missed opportunity for the optimal use of the land.

Neither Maranello House nor the Cobham Rise/Station Approach developments have underground car parking beneath their buildings. Instead both have outside impervious tarmac parking areas. This results in more water running into the already overloaded drainage system instead of using the land for environmentally attractive garden areas that would make flat dwelling attractive for those seniors who lose their gardens when downsizing.

Without proper market research particularly that of a demographic nature any plan is worthless and an outside independent marketing consultant should be engaged as a matter of urgency to examine the efficacy of Guildford Borough Council’s planning department’s staff.

A return to the drawing board in any case is necessary due to the Referendum result which is forecast to see a reduction in London’s population due to the transfer of many employees in London’s financial services to the Continent. Surrey in general including the commuter villages of East and West Horsley will certainly be affected.

As you can see we have sent copy of this email to the parliamentary office of our local MP, Sir Paul Beresford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. I object to the inclusion of the land at Garlick's Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (88). There are no exceptions which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick's Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.
National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy 13).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy 14)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any

infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy 11)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3935  Respondent: 10989601 / Margaret Mew  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<td>1. I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)</td>
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<td>I object to the local plan based on the impact it will have on the special countryside of the borough.</td>
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<td>The proposed development at Garlick's Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.</td>
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<td>The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick's Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development , with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick's Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.</td>
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<tr>
<td>1. I object to the location for new employment floorspace at Garlick's Arch - Site A43 (Policy E2)</td>
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<td>1. I object to the location for new employment floorspace at Garlick's Arch - Site A43 (Policy E2)</td>
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1. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Glandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8380  Respondent: 10989601 / Margaret Mew  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the lack of proper infrastructure planning for sites (Policy 11)

Policy 11 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick's Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents' in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick's Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.
Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy 12)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. I object to poor air quality concerns (Policy 13)

Paragraph 4.6.27 of the Plan states that "Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health." The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Attached documents:

Comment ID: PSLPP16/8373  Respondent: 10989601 / Margaret Mew  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to not protecting the Green Belt (Policy P2)

I object to the proposals to remove the villages of Ripley, Send and Glandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43).

National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8374  Respondent: 10989601 / Margaret Mew  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8371  Respondent: 10989601 / Margaret Mew  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over development, particularly for the villages between Guildford and the M25, including Ripley, Send and Glandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35) and Garlick's Arch (A43) are in unsustainable locations. They do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure
Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Glandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8372  Respondent: 10989601 / Margaret Mew  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Glandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Glandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3930  Respondent: 10989761 / James Walsh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A6
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A6 (p.156) and Spatial Vision (p.22) While I broadly support the plans for the North Street regeneration, I am concerned that the amount of space allocated for food and drink has doubled from 3,000 sq m to 6,000 sq m in the latest iteration of the plan. Like many towns, Guildford already has an abundance of restaurants and fast food shops and I would like to see a more imaginative use of this space – boutique shops, studio space and space for independent traders, for example.

I am also concerned about the addition of 200 flats to the 200 earmarked in the 2016 version of the plan – the town centre should not become the repository of all the high-density housing in the borough and a balance needs to be struck with the villages and other urban areas. I am concerned about the traffic and parking implication of such a high number of flats concentrated in the town centre – and it is not advisable to consider ANY developments as “car-free” options, as most people will continue to use cars to travel.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2011  Respondent: 10989761 / James Walsh  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy D4, p119: I strongly support the Council’s commitment to high standards of design and character for new developments. I feel that the design of buildings and materials used can have an important impact of the character of Guildford and would like this to be an important factor in planning decisions in future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2009  Respondent: 10989761 / James Walsh  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
**Policy H1, p.35, Section 3:** I am very pleased to see the inclusion of the section on Accessible Homes and the percentage of homes that will be wheelchair accessible and adaptable. What measures will be in place to measure the outcome of this policy?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Answer (if comment is on questions 1-7 of the questionnaire): ( )

**Policy H2, p.44, Section 1:** While I welcome the Council’s commitment to work with partners to provide more affordable homes, I would support the development of mixed-tenure estates rather than estates of either private or “affordable” housing.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Answer (if comment is on questions 1-7 of the questionnaire): ( )

**Policy ID3, p130:** Why I support measures to improve and enhance Guildford’s environment, and manage transport and parking across the borough, I do not believe that car-free parking is feasible or realistic – even in the town centre. While public transport remains expensive, crowded and unreliable, people will always own cars to travel to the town centre – or away from it. I believe that any developments that are built with “car-free” in mind will only increase parking problems for neighbouring streets – already a big problem across the borough.

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Policy S2, p29, Section 4.1.9: The Council already has reservations about the financial achievability of several of its “big ticket” capital plans, including SARP and North Street (as expressed in the last O&S meeting). I am concerned, therefore, that this policy states that large development sites, including strategic development sites, will deliver the majority of new developments in the 6-11 year period and 11-15 year period. It would appear that the success of the second half of the Local Plan will depend on the viability and affordability of a few core programmes that already have question marks over them – making half of the plan an uncertain prospect before we even start.

Policy S2, p30, Section 1: The Council proposes to build 1,434 fewer homes as part of the revised plan. I question the wisdom of this at a time of increasing need for housing of all types.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>6) I object most strongly to the lack of any evidence for the alleged housing need numbers</td>
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<td>1) I object most strongly to any and all erosion of the Green Belt</td>
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<td>2) I object most strongly to any “in setting” of any villages from the Green Belt</td>
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3)  I object most strongly to the disproportionate amount of development in one area of the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/143  Respondent: 10989793 / Ruth Pott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4)  I object most strongly to the limited consultation period

5)  I object most strongly to the last minute inclusion of new sites with less than two weeks notice

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2082  Respondent: 10990017 / Brigitte Ince  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Having looked at the proposals put forward by Guildford Borough Council in the new Draft Local Plan, I would make the following points and objections regarding the plans to develop sites at:

- Thatchers Hotel, East Horsley (ref A36, ID 2044)
- Ockham Road North, East Horsley (ref: A39, ID 240)
- Bell & Colvill Garage, West Horsley (ref: A37, ID 1 6)
- Ockham Road North, West Horsley (ref: A40, ID 975)
- Manor Farm, West Horsley (ref: A38, ID 1 5)
- East Lane, West Horsley (ref: a 41, ID 2063)
Wisley Airfield site

My concerns and objections to the proposals to develop these sites are as follows:

**Loss of Green Belt land**

The Green Belt is a very precious resource and without the strong protection it offers against most forms of development, the countryside will be consumed by urban sprawl and the character of our village and surrounding area will be irreversibly eroded. Allowing development in the Green Belt assumes that this land is only valuable if built on, a flawed assumption in my view. Maintenance of the Green Belt is needed now more than ever.

**Traffic and parking**

The negative impact on local roads will be tremendous. Parking at Horsley & Effingham junction train stations is already full on most days. There is very little parking for the shops along Station Parade and Bishopsmead at present. Parking for the Horsley Medical Centre and at the village hall is likely to be impossible.

**Pollution**

The large increase in volume of traffic will cause an increase in nitrogen dioxide and particulates in the environment – already a cause for concern for health and to the environment in several areas in the Borough.

**Flooding**

The site behind Ockham Road North in East Horsley is partially a level 3 flood risk area. Building on such land will only exacerbate the problem. Local roads already flood when it rains as the drains are unable to cope.

**Schools**

Local schools are already at capacity and yet no extra places are planned in the Horsleys, and the school places proposed at Wisley Airfield are not likely to be available until many years into the project as far as I understand.

**Medical facilities**

I assume the Horsley Medical Centre is already at capacity as we are often quizzed by the receptionists as to whether or not we are full-time residents of the Horselys. Students (as part-time residents) are already treated particularly badly due to the existing overcrowding of this facility.

**Transport**

The Draft Local Plan is likely to give rise to misery for commuters, with nowhere to park and full trains at commuting times. It is bad enough now, let alone if the 500+ houses under consideration for the Horsleys and the 2000 houses at Wisley Airport are approved and built.

**Enormous scale of building programme**

I am very concerned about the enormous scale of the proposed building program which seems to overestimate the rise in population in the area within the 2013-2033 time scale when compared to the Office of National Statistics projection for the same period. This would also lead to years of living in the midst of a building site with all the heavy trucks, road congestion, noise pollution and disruption that this would involve.

I trust you will take my views into consideration.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
**APPENDIX C**

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**APPENDIX D**

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability and
- flaws in the method for estimating the number of homes needed to support job growth.
It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3910  Respondent: 10990145 / Anne Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.
4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3911  Respondent: 10990145 / Anne Lee  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY A25 - Gosden Hill Farm

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below and elsewhere).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.
The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY A43 AND A43a – Garlick’s Arch

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council’s eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.
Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3914  Respondent: 10990145 / Anne Lee  Agent:  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>1. <strong>POLICY D3</strong></td>
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<td><strong>I OBJECT</strong> to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)</td>
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<td><strong>I OBJECT</strong> to the local plan based on the impact it will have on the special countryside of the borough.</td>
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<td>The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.</td>
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<td>1. <strong>POLICY D3</strong></td>
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<td><strong>I OBJECT</strong> to Policy D3 - Historic environment</td>
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<td>I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8325  Respondent: 10990145 / Anne Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E1

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.
The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. POLICY E5

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8342  Respondent: 10990145 / Anne Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8336  Respondent: 10990145 / Anne Lee  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/8334  Respondent: 10990145 / Anne Lee  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Student numbers will obviously need recalculating in the light of Brexit. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8335  Respondent: 10990145 / Anne Lee  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H2

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8340  Respondent: 10990145 / Anne Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/8331  **Respondent:** 10990145 / Anne Lee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY II

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy II)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy II. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy II requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network, telephone cables and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8332  Respondent: 10990145 / Anne Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY I2

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

Problems conspiring to make the A247 even more dangerous and frequently impossible to navigate:

1. Proposed green belt developments eg: at Gosden Hill and Wisley Airfield
2. Proposed development at Garlicks Arch
3. Proposed new junctions off the A3
4. Clandon Park (National Trust) redevelopment as a major tourist attraction
5. Many blind spots for householders trying to exit on to the road
6. Increasing development of Clandon First School on the A247
7. The narrow sections on the road so that two lorries or buses cannot pass each other
8. Any accidents or problems on the A3 and/or M25 causing lengthy tail backs along the A247
9. Proposed tourist/play developments at Newlands Corner

10 Existing footpaths alongside the role non-existent and/or inadequate

The existing problems and proposed developments will completely overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. The A247 is already very heavily used whilst being entirely unsuitable for designation as an A road.

Note the following accident data:

2010–2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays

Surrey Fire and Rescue deployed.
2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road
- 12 07 2016 Two cars in collision (and at least one written off) outside Summers on the A247

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high. **There is already 95% of a Clandon By Pass built: a consistently wide road with little housing fronting on to it. Park Lane and Merrow Lane lead directly from Merrow to the A3 at Burpham. Completing this by pass needs actioning before any further development in the Clandon area is considered and it is negligent of the Council not to pursue this in concert with Surrey County Council and the Highways Agency.**

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8333  Respondent: 10990145 / Anne Lee  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY I3**

**I OBJECT** to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8317  Respondent: 10990145 / Anne Lee  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.
This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another.

The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/8323  **Respondent:** 10990145 / Anne Lee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY P4**

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the
flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8315  Respondent: 10990145 / Anne Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I set out below my objections to specific policies and matters within the Plan.

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services such as roads, GP surgeries and schools in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Another serious accident on the narrow section of the A247 two days ago about 10am caused cars to be written off and potentially devastating consequences for a disabled resident of West Clandon. Every day I take my life into my hands trying to drive on to the A247 or walk the path alongside it. This is even more serious for young mothers pushing buggies and taking young children to school. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will severely suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8316  Respondent: 10990145 / Anne Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere;
unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing
that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>SQLP16/1187</th>
<th>Respondent: 10990145 / Anne Lee</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
<td></td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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1. Questions posed by Guildford Borough Council as part of its consultation.

Questions from GBC

24.A. Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

ANSWER
I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1188  Respondent: 10990145 / Anne Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24.B. Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant? Please provide the following information being as precise as possible:

• why you consider it is or is not legally compliant and
• what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.
The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/1189 **Respondent:** 10990145 / Anne Lee **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**24.C. Question 3: Soundness**

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

**ANSWER**

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. "Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt." Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites-which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation

2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation

3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound

4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018

5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars

6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham

7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework

8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
24.D. Question 4: Duty to cooperate

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

- why you consider it has or has not complied with the Duty to cooperate and
- what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate. This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough. The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages. This is not cooperation by any definition. In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4729 Respondent: 10990145 / Anne Lee Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4730  Respondent: 10990145 / Anne Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to
build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3180  Respondent: 10990145 / Anne Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp17q/641  Respondent: 10990145 / Anne Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/312  Respondent: 10990369 / Paul Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/140  **Respondent:** 10990465 / Victoria Bean  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the fact that GBC have failed to provide sound evidence in terms of the Employment Land Needs Assessment which shows that industrial space at Burnt Common IS NO LONGER NEEDED.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPA16/139  **Respondent:** 10990465 / Victoria Bean  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I live at [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] and I am completely opposed to the proposed building of hundreds of houses in Send. This would completely change the villages of Send and Ripley and the proposal has not been thought through properly for many reasons.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/189  Respondent: 10990465 / Victoria Bean  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT to Policy A43.30 the proposed development of Garlicks Arch designated for 400 houses and an industrial estate. This is a new site not included in the Regulation 18 draft and has NOT been consulted on previously. It is not only permanently protected green belt but also a site of ancient woodland with some trees planted in the 16th century.

I OBJECT to policy A43.30 the development of new four way interchange onto the A3 which would mean that narrow Send Road (A247) would be the main route for traffic leaving the M25 and A3. It is already crowded and vulnerable to traffic jams. Further traffic from this development would result in permanent gridlock. It simply would not work.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/190  Respondent: 10990465 / Victoria Bean  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT to policy A44 which would see 40 homes and two travellers' pitches on land west of Winds Ridge and Send Hill. This was again a NEW site NOT included in 18 draft and therefore has NOT been consulted on previously. Once again this is Green Belt land partly containing unsafe landfill. Access is by a narrow lane which could never take the volume of traffic that would ensue from traveller's pitches.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</th>
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<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>I OBJECT to the fact that the Local Plan takes no account of schools, doctors surgeries and roads that are already operating at full capacity. Another 4000 houses in this area with a conservative estimate of a further 8000 cars would be catastrophic.</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>I OBJECT to the removal of 15 villages, including Ripley and Send, from the green belt. This will lead to wholesale, and often inappropriate developments.</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<td>Attached documents:</td>
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<th>Comment ID: SQLP16/180  Respondent: 10990465 / Victoria Bean  Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>I OBJECT to the fact that GBC have not followed the correct process for Send and Ripley developments. Any significant changes to the 2014 proposals, such as the proposal development of Garlicks Arch, should have required another full consultation, which did not happen. This invalidates the whole process.</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<td>Attached documents:</td>
</tr>
<tr>
<td>Comment ID: PSLPA16/3485</td>
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<tr>
<td>--------------------------</td>
</tr>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford</td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I am formally objecting to the local plan to build 1,100 houses and a school in Normandy between Glaziers and Westwood Lane on the following grounds:

There is no infrastructure in the village - no shop, library, pub and very few buses. The roads are narrow and there are two accident black spots on Aldershot Road and Flexford. The size of the development is completely out of scale with the surrounding area. The planned development is green belt. In the interests of equality the plan is breaching the act as it is treating Normandy unfairly by building far more homes than any other area of Guildford borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPS16/6975</th>
<th>Respondent: 10990593 / Teresa Egerton</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A46</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<thead>
<tr>
<th>Comment ID: PSLPA16/2085</th>
<th>Respondent: 10990657 / Diana Owen</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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</tbody>
</table>

2008
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not understand where the figures have come from that have decided this incredible increase in the number of houses that are required in the Horsleys

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4161  Respondent: 10990657 / Diana Owen  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I understand the 2,000 homes proposed for the former Wisley Airfield remain in the Plan despite it being refused by the FULL Planning Committee in 2016.

This site is still not appropriate for this development because of the increase in traffic both at the site and in the surrounding areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8748  Respondent: 10990657 / Diana Owen  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposal to have up to 593 new houses in the Horsleys would put the infrastructure of the local schools, medical facilities, shops and parking under enormous pressure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/8747  Respondent: 10990657 / Diana Owen  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object strongly to the proposed removal of the Horsleys from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/5067  Respondent: 10990689 / Margaret Sacre  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/4182  Respondent: 10990785 / Valerie Golding  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

---
I OBJECT to the building on the Green Belt at Send at Garlick's Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded at the whim of a pro-developer prone council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPS16/7746  **Respondent:** 10990785 / Valerie Golding  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**POLICY A35**

I OBJECT this land is agriculture land located in the Green Belt it is a Site of Nature Conservation Importance. It has according to the Surrey Botanical Society Records 228 different species of plants and grasses of which the following are scare in Surrey or are on the GB Red List:

<table>
<thead>
<tr>
<th>Taxon</th>
<th>Vernacular</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aethusa cynapium subsp. agrestis</td>
<td>Fool's Parsley</td>
<td>Surrey Scarce</td>
</tr>
<tr>
<td>Aira caryophyllea</td>
<td>Silver Hair-grass</td>
<td>Surrey Scarce</td>
</tr>
<tr>
<td>Alopecurus geniculatus</td>
<td>Marsh Foxtail</td>
<td>Surrey Scarce</td>
</tr>
<tr>
<td>Apera spica-venti</td>
<td>Loose Silky-bent</td>
<td>GB Red List Near Threatened</td>
</tr>
<tr>
<td>Centaurea cyanus</td>
<td>Cornflower</td>
<td>BAP, Surrey Scarce</td>
</tr>
<tr>
<td>Eleocharis palustris</td>
<td>Common Spike-rush</td>
<td>Surrey notable</td>
</tr>
<tr>
<td>Species</td>
<td>Common Name</td>
<td>Conservancy Status</td>
</tr>
<tr>
<td>---------------------------------------------</td>
<td>------------------------------</td>
<td>-----------------------------</td>
</tr>
<tr>
<td>Epipactis helleborine</td>
<td>Broad-leaved Helleborine</td>
<td></td>
</tr>
<tr>
<td>Filago vulgaris</td>
<td>Common Cudweed</td>
<td>GB Red List Near Threatened</td>
</tr>
<tr>
<td>Gnaphalium sylvaticum</td>
<td>Heath Cudweed</td>
<td>GB Red List Endangered</td>
</tr>
<tr>
<td>Hypericum tetrapterum</td>
<td>Square-stalked St John's-wort</td>
<td>Surrey notable</td>
</tr>
<tr>
<td>Lamium amplexicaule</td>
<td>Henbit Dead-nettle</td>
<td>Surrey notable</td>
</tr>
<tr>
<td>Ophrys apifera</td>
<td>Bee Orchid</td>
<td></td>
</tr>
<tr>
<td>Parentucellia viscosa</td>
<td>Yellow Bartsia</td>
<td>Surrey Scarce</td>
</tr>
<tr>
<td>Saxifraga tridactylites</td>
<td>Rue-leaved Saxifrage</td>
<td>Surrey Scarce</td>
</tr>
<tr>
<td>Scleranthus annuus</td>
<td>Annual Knawel</td>
<td>BAP, GB Red List Endangered</td>
</tr>
<tr>
<td>Spergula arvensis</td>
<td>Corn Spurrey</td>
<td>GB Red List Vulnerable</td>
</tr>
<tr>
<td>Torilis nodosa</td>
<td>Knotted Hedge-parsley</td>
<td>Surrey Scarce</td>
</tr>
<tr>
<td>Trifolium striatum</td>
<td>Knotted Clover</td>
<td>Surrey Scarce</td>
</tr>
</tbody>
</table>

It is adjacent to Elm Corner Wood and Hunts Copse both Sites of Nature Conservation Importance and in the proximity of a Thames Basin Heaths SPA of Ockham and Wisley Commons Site of Special Scientific Interest. The development would be a disaster for the area 2000 homes would be 6000 people, 12000 feet destroying the area.

The council has already rejected the development proposal for the site for the following reason:

- Green Belt location and absence of “exceptional circumstances”.
- Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.
- Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).
- Proximity to A3/M25 bottleneck and Ripley village and roundabouts.
- Absence of adequate traffic data.
- Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.
• Loss of high-quality agricultural land (55% of the site), in breach of national policy.
• Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.
• Presence of a Surrey County Council safeguarded waste site.
• Cost of infrastructure required to the detriment of alternative more favourable sites.
• Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.
• Impact on listed buildings.
• Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.
• Extreme housing density with tiny garden spaces.
• Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.
• Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).
• Failure to evaluate the cumulative impact of this and nearby development sites on the area.

But as reported in the national press the CEO of the Cayman Island Company (which have three major player from the Tory party including an former minister connected to it) who owns the land at Wisley, made a donation of £100,000 to the Tory party and then the site is back in the local plan. One can only wonder how this can happen, possible a phone call from central Office to its supports on Guildford Council? The company seem very sure they will get their approval because at the local cinema’s they are showing a short film during the adverts extolling how wonderful the development will be.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7747  Respondent: 10990785 / Valerie Golding  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A42

I OBJECT I object to building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7748  Respondent: 10990785 / Valerie Golding  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
Policy A43

I OBJECT to the development at Garlick’s Arch for 400 houses and 7,000 m2 of industrial units because according to the latest Employment Land Needs Assessment 2015 (ELNA) shows a 80% reduction in the requirement for employment floor space from the previous draft plan. I also object in the way it was sprung on the village at the last moment with only 2 weeks’ notice and without any prior consultation. This is not required in terms of housing need either for the village or the borough. Approx 50% of the area is subjected to flooding, it contains two Ancient Woods Which do have some protection under the NPPF guild lines clause 118 this, amount of development will destroy the woods. Space exists at Slyfield for the industrial units and the residential property should go into Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7749  Respondent: 10990785 / Valerie Golding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Policy A43a

I OBJECT to the proposed slip roads at Burnt Common, this will on add to traffic using the A247 drawing more traffic through Send from the south west of Woking. It is also only 2.5 miles from an existing junction. This is GBC trying to say the infrastructure is being improved to accommodate the proposed developments, but it will make matters worse on local roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7750  Respondent: 10990785 / Valerie Golding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44
Policy A44

I OBJECT to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

I OBJECT to the exaggerated “housing need” This figure has been conjured up by the consultant to act as a developers charter the figure of 13,860 shows no relationship to the Office of National Statistics (ONS) figures for Guildford they show a very small rise in the general population. This 13,860 figure is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need. Students should be accommodated by the university on the campus by using planning applications already granted for student accommodation and building over the car park on campus still maintaining the parking below the accommodation, it is the University of Surrey problem not Guildford borough residence problem.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17188  Respondent: 10990785 / Valerie Golding  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy D4

I OBJECT to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford. The village and the countryside behind the A247 should all be protected.

I OBJECT to three particularly vulnerable areas of high quality amenity land being taken out of the Green Belt around Send which include:

1. The land behind the schools including playing fields and woodland.
2. The land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering.
3. Land to the left of Cartbridge going up to the old depot on the Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17187  Respondent: 10990785 / Valerie Golding  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposal to create ribbon development along the A3 from Junction 10 of the M25 to Guildford with the development that are proposed for Wisley Airfield 2000 houses, Garlick’s Arch 400 houses and industrial space, Gosden Farm 2000 houses and Blackwell Farm. 1850 houses. This is what the GreenBelt was set up to stop. Typical of the aptitude of GBC, they have totally ignored building on Brownfield sites other than more unwanted retail space.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3737  Respondent: 10991841 / Abbey Jarman  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed local plan for the following reasons:

I object to the village’s removal from the Green Belt or extending the 2003 Local Plan Settlement Area boundaries.

West Horsley’s settlement boundaries don’t need to be extended.

We have a rich mix of low density housing and historic buildings. It sits partly within the Surrey Hills AONB and is enjoyed by visitors, such as walkers and cyclists.

Housing should be near economic development sites on the opposite side of the borough.

The key evidence document (Guildford Borough Economic Strategy 2013-2031) doesn’t make a case for a large increase in housing in West or East Horsley.

13,800 new houses (built between 2013 and 2033) in the villages surrounding Guildford, particularly in West Horsley, are excessive and unsustainable.

In West Horsley we have one small shop, no post office, and a very restricted bus service. This is inadequate for the proposed increase in housing. Already you can’t park outside the shop half the time!

Local infrastructure can’t cope as it is; there is a lack of schools and shops; drainage is overloaded; parking is in short supply. The station car park in East Horsley is often full already and will just lead to people parking on the sides of the roads, many of which are narrow. This would entirely spoil the look of the existing rural nature of the village. We do not want all our roads lined by cars!

There is no proof that this number of homes to be constructed during the first 5 years is needed. The West Horsley Parish Council and Surrey Community Action Housing Survey: May 2014 said that 20 additional affordable homes to cater for
young people and local elderly people who wished to remain in the village by down-sizing to smaller homes would be required. There are enough smaller sites where this can happen.

Guildford Council hasn’t shown to my satisfaction that a large number of houses can’t be built in the town centre/brownfield sites instead. It’s clearly cheaper for developers to build on greenfield sites and this is an utterly unacceptable reason for West Horsley to be taken out of the Green Belt.

Developers have been asked to propose facilities for the elderly, disabled, or those with small children, (best served by developments/transport within towns and close to extensive amenities, including health care) which is not the same as ‘will be REQUIRED to deliver’.

The Raleigh School has been oversubscribed for several years.

Pupils attending the Howard of Effingham School (which has very limited places) have to make a significant bus or car journey to get there.

There is already heavy peak-time traffic to the two private schools of Glenesk and Cranmore.

It’s already difficult to get an appointment at the doctors’. An increase in patients will just make this even worse.

There are trains to London and Guildford, but the station car park is normally full during the week. It won’t be possible to extend the car park. Why build houses out in the country if people have to then get a train into Guildford? Build the houses in Guildford in the first place!

Because of the West Horsley’s location most households have at least 2 cars. The proposed housing will increase traffic on the already third-world roads, which are in a shocking state as it is.

Sewage often overflows in Ockham Road and Green Lane.

Thames Water has told Guildford Council that drainage network probably won’t be able to cope with any increased proposed population increase demand. Apparently the foul water drainage system connecting West Horsley to the treatment works north of Ripley needs upgrading and Thames Water suggests 2-3 years lead-in following planning permission if given.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp171/2110  **Respondent:** 10991841 / Abbey Jarman  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to the proposed local plan:

1. The reduction in the number of new homes in the Green Belt is insufficient. There is still an enormous number of new dwellings proposed for construction in the Green Belt, particularly when considered in proportion to the number of existing homes.
2. It is proposed that the area east of the borough takes an even higher number of dwelling in the Green Belt than before.
3. Many other councils have chosen not to constrain overall housing growth to protect the Green Belt, yet Guilford has not. Although the objectively-assessed housing target has been reduced since the 2016 plan to 12,466 dwellings by 2034, this still represent a 25% growth for Guilford, which is disproportionate.
4. Nothing has changed since last year’s consultation to address the sustainability aspects of the West Horsley development sites, as is required by national policy requirements. No matter how much people are encouraged to travel on foot or by cycling, each new home will need at least one car to give access to Horsley station, shops, medical centre, library, etc.; this is easily demonstrable.
5. More apartments are needed in Guildford, not more retail space. The rise of on-line shopping and the reduction in physical shopping is clearly documented and many authoritative reports support that view that the trend will continue.
6. No changes have been made to the proposal to inset both East and West Horsley from the Green Belt. Policy P2 states that the Metropolitan Green Belt will continue to be protected against inappropriate development. I object to the village’s removal from the Green Belt by insetting and extending the 2003 Local Plan Settlement Area boundaries.
7. The overload of local social and physical infrastructure is not addressed. Increased demand for access to medical facilities, schools, station parking, roads, and particularly disposal of waste water remain at large.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2109  Respondent: 10991841 / Abbey Jarman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed local plan:

1. The reduction in the number of new homes in the Green Belt is insufficient. There is still an enormous number of new dwellings proposed for construction in the Green Belt, particularly when considered in proportion to the number of existing homes.
2. It is proposed that the area east of the borough takes an even higher number of dwelling in the Green Belt than before.
3. Many other councils have chosen not to constrain overall housing growth to protect the Green Belt, yet Guilford has not. Although the objectively-assessed housing target has been reduced since the 2016 plan to 12,466 dwellings by 2034, this still represent a 25% growth for Guilford, which is disproportionate.
4. Nothing has changed since last year’s consultation to address the sustainability aspects of the West Horsley development sites, as is required by national policy requirements. No matter how much people are encouraged to travel on foot or by cycling, each new home will need at least one car to give access to Horsley station, shops, medical centre, library, etc.; this is easily demonstrable.
5. More apartments are needed in Guildford, not more retail space. The rise of on-line shopping and the reduction in physical shopping is clearly documented and many authoritative reports support that view that the trend will continue.
6. No changes have been made to the proposal to inset both East and West Horsley from the Green Belt. Policy P2 states that the Metropolitan Green Belt will continue to be protected against inappropriate development. I object
to the village’s removal from the Green Belt by insetting and extending the 2003 Local Plan Settlement Area boundaries.

7. The overload of local social and physical infrastructure is not addressed. Increased demand for access to medical facilities, schools, station parking, roads, and particularly disposal of waste water remain at large.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2111  Respondent: 10991841 / Abbey Jarman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed local plan:

1. The reduction in the number of new homes in the Green Belt is insufficient. There is still an enormous number of new dwellings proposed for construction in the Green Belt, particularly when considered in proportion to the number of existing homes.
2. It is proposed that the area east of the borough takes an even higher number of dwelling in the Green Belt than before.
3. Many other councils have chosen not to constrain overall housing growth to protect the Green Belt, yet Guilford has not. Although the objectively-assessed housing target has been reduced since the 2016 plan to 12,466 dwellings by 2034, this still represent a 25% growth for Guilford, which is disproportionate.
4. Nothing has changed since last year’s consultation to address the sustainability aspects of the West Horsley development sites, as is required by national policy requirements. No matter how much people are encouraged to travel on foot or by cycling, each new home will need a least one car to give access to Horsley station, shops, medical centre, library, etc.; this is easily demonstrable.
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6. No changes have been made to the proposal to inset both East and West Horsley from the Green Belt. Policy P2 states that the Metropolitan Green Belt will continue to be protected against inappropriate development. I object to the village’s removal from the Green Belt by insetting and extending the 2003 Local Plan Settlement Area boundaries.
7. The overload of local social and physical infrastructure is not addressed. Increased demand for access to medical facilities, schools, station parking, roads, and particularly disposal of waste water remain at large.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/5782  Respondent: 10991873 / Trevor W. Orpwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the draft Local Plan for the following key reasons:

- The plan has been based on the intention of adding 13,860 new homes to Guildford Borough over the 2013 - 2033 period, this represents a massive increase of 25% of the housing provision in just 20 years, the need for this huge increase has not been explained or justified, as neither has the basis on which the SHMA has been calculated. It is also the case again without justification that GBC has enhanced this figure to a level which is 70% higher than the official national estimates for population growth than the Borough. The GBC has no mandate from its residents to provide this additional level of housing and therefore has completely departed from the ethos of “localism” in planning policy.

The effect of Brexit will be to reduce the demand for housing nationally and the ability of the building industry to provide it, making GBC’s figures even more extraordinary.

- I object to a plan which proposes that over 70% of the new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are for no good reason being forgotten and ignored.

- I object to the disproportionate allocation of this new housing in this particular part of the borough which means that over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt, and its inclusion in the Local Plan as a site suitable for development. This site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. The proposed removal of this site from the Green Belt by GBC only a few months after Wisley Property Investments Ltd. ‘s (WPI) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers is totally hypocritical, lacking in logic and integrity, and would seem to indicate the existence of an unduly coercive influence by the associated developers on some council members.

From what I have seen of the Local Plan Guildford’s planners, councillors and external consultants seems to have forgotten (or not be aware of) what gives the Borough and Surrey as a whole its unique character and the attributes which currently make it one of the most desirable places in the country to live in.

The first of these is of course that a good proportion of the Borough and indeed the county is countryside protected by the Green Belt, a piece of planning legislation which has given London its “Lungs” and prevented an unrestricted urban sprawl envied by most of the world’s capital cities.

The second is that quintessential element of the British countryside, small villages dotted about the county each with its own character, vernacular architecture, church and village green and individual communities.

The third attribute is the space that we enjoy by choosing to live in a rural and not an urban environment.

The proposals shown in the Local Plan spell out the destruction of what causes this part of Surrey to be unique and will devalue the quality of life of many of the Borough’s residents particularly in the Horsleys, Ockham, Ripley and Send.

- For these reasons I also object to the proposed extension of the Settlement Boundaries of the Horsleys.
I also object to the Local Plan proposals for any significant increase in the population of the Horsleys, Ockham, Ripley and Send. Notwithstanding the effect of proposed development in these villages the provision of over 2,000 homes on the Former Wisley Airfield will add some 5,000 to 6,000 people to the area and probably 3,000 or more extra vehicles. This new community will need to get to their workplaces and schools and as there is no train station proposed for Wisley Airfield they will have to travel by car either by driving to Guildford or London or to the train stations at Horsley and Cobham. This will involve them accessing the A3 where the 3,000 vehicles would first have to go south to the Ripley/Ockham junction before going east to Horsley Station or north to London and Cobham.

At the present time at rush hour there are often queues northbound between the Ripley/Ockham roundabout and the Cobham roundabout and the addition of a further 3,000 vehicles at this time would cause these roundabouts to seize up and effectively close the A3. Those motorists lucky enough to complete their journeys via the A3 will find that there will not be any spare car parking at either of the stations (where there is no room to extend either the car parking or the platforms) and even if by chance they did find a space in the car park they probably would not find one on the train.

In the villages most of the primary foul water, surface water, electricity, gas, and telephone services are 80 or more years old, close to capacity and near to the end of their effective life. My personal experience of this is that in the six years that I have lived in Ockham Road South East Horsley the electrical supply to my part of the road has failed twice, once for five days and the second time for two days due as the electricity supplier told me, to the age and capacity of the mains cables.

Although new energy saving technologies and elements like sustainable underground drainage systems can to a degree reduce the impact of any new developments ultimately they still have to be provided with services form the existing primary utilities infrastructure which will not be able to cope or be renewed by the monies obtained from the anticipated community infrastructure levies.

Other resources which will be overwhelmed will of course be the local healthcare services (where appointments are already difficult to get) and many will be aware of the near impossibility of parking at Royal Surrey County Hospital. It is also the case that most of the local “country” roads already have difficulty in withstanding the onslaught of potholes following each winter, without the added attrition of 100’s of heavy good vehicles which will be unleashed when any significant development works start.

I also object to the classification of the East Horsley Station Parade as a designated “District Centre” this is pure artistic licence by the Plans authors, it is just a small shopping parade.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/3456  **Respondent:** 10991873 / Trevor W. Orpwood  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the fact that the council has failed to remove the Three Farms Meadows this site from the local plan despite receiving 1000’s of objections from local residents and statutory consultees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1674  Respondent: 10991873 / Trevor W. Orpwood  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1679  Respondent: 10991873 / Trevor W. Orpwood  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of a 10% buffer in the housing number over the plan period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/311  Respondent: 10991873 / Trevor W. Orpwood  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

From what I have seen of the “Strategy and Site Issues and Options” (SSIO) Guildford’s planners, councillors and external consultants seems to have forgotten (or not be aware of) what gives the Borough and Surrey as a whole its unique character and the attributes which currently make it one of the most desirable places in the country to live in.

The first of these is of course that a good proportion of the Borough and indeed the county is countryside protected by the Green Belt, a piece of planning legislation which has given London its “Lungs” and prevented an unrestricted urban sprawl envied by most of the world’s capital cities.

The second is that quintessential element of the British countryside, small villages dotted about the county each with its own character, vernacular architecture, church and village green and individual communities.

The third attribute is the space that we enjoy by choosing to live in a rural and not an urban environment.

The proposals shown in the SSIO Document spell out the destruction of what causes Surrey to be unique and will devalue the quality of life of most of the Borough’s residents. I do not believe that the residents of Guildford have at any time given the Council this mandate.

Certainly the worst thing that Guildford Borough Council could do would be to implement a local plan which would destroy much of the Borough’s charm and heritage, by removing our villages from the protection which our unique and wonderful Green Belt provides and allowing them to be swamped by large scale estates, which will irrecoverably change the character of our Borough for the worse, and to the detriment of all who live here. This is the opposite of what a good, democratic and properly consulted Local Plan should be, and the reason I object to the Plan and its proposed Amendments.

I object to the extension of the plan period by 1 year as it has not been identified as a major change

I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>The former Wisley Airfield development</th>
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<tbody>
<tr>
<td>I object to the current plan of developing the Wisley Airfield with more than 2000 houses.</td>
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<tr>
<td>Creating a town, nearly the size of the Horsleys together, will immensely affect the local infrastructure. It currently provides a barrier to outward development from London which once the development is in place will merge villages and bring London much too close.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<th>Infrastructure and facilities already stretched. Even without the plan in place we are struggling with the current infrastructure.</th>
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<tbody>
<tr>
<td>I object to the current plan which has little to no plans for improving infrastructure and facilities.</td>
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<tr>
<td>As the local demographic is changing rapidly we are experiencing oversubscribed schools, medical services unable to cope, full roads and busy trains.</td>
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<td>Our medical services, roads, schools and local shops wont be able to cope with the suggested increase of 600 houses in the Horsleys over the next 5 years.</td>
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<tr>
<td>a) Horsley Medical Practise</td>
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<td>In my view, the medical practise in particular is already beyond capacity. Getting an appointment is a struggle to say the least. I cant see how a massive increase in houses is going to help improve the practise functioning properly without any plans for another medical practise in the area.</td>
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<tr>
<td>b) Primary and secondary state schools</td>
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<td>The Raleigh school and the Howard of Effingham schools are bursting at their seams in their current state. I am well aware that new locations and buildings need to be found without the suggested local plan in place. I therefor support new locations and buildings for both allowing a better and suitable building to serve the numbers of children in the area. I can not imagine what it will mean with the suggested local plan in place and no plans for facilitating future generations of children with decent schooling. Shameful planning!</td>
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</tbody>
</table>
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11153  Respondent: 10992065 / Saskia Janssen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt needs to be protected.

I object to the current plan which removes the Horsleys out of the green belt.

I moved out of London, over 6 years ago, after having lived there for more than 10 years. We are a young family and made a conscious decision to live in a healthy and green environment. We found Horsley to be that place. Surrounded by clean air, peace and quiet, no light pollution at night, woodland and nature in a small community. A perfect place for our kids and us to be outside and be a healthy happy Family. I believe strongly that in protecting the green belt you protect it for the future. Not only for those who live here but also for those who visit. Once it’s gone its gone!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11156  Respondent: 10992065 / Saskia Janssen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I’d like to conclude that I’m under no illusion that a certain percentage of housing will need building to allow for a growing population. Without improved infrastructure and facilities the plan is shameful and unrealistic. As we are positioned just outside the M25 we will be affected by London’s growth in particular. However I feel strongly that the local plan should be revised especially as it affects the countryside we live in providing a quality of life that is not measured in pounds or percentages. Please reconsider the true housing requirements needed before irreparable damage to the great British countryside. Its precious to us and generations to come.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3508  Respondent: 10992225 / Emma Ringshaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough, since this figure is too high and not supportable (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
• It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough. This is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPS16/6799</th>
<th>Respondent: 10992225 / Emma Ringshaw</th>
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. I OBJECT to Gosden Hill development being in the Local Plan The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip road to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which raise health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6800  Respondent: 10992225 / Emma Ringshaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).
The Plan states the preference is for making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced by a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light to local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hour no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylons run through the site, and these will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6801  Respondent: 10992225 / Emma Ringshaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The proposed addition of north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.
The route from London/M25 to Woking would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc.) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14631  Respondent: 10992225 / Emma Ringshaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14628  Respondent: 10992225 / Emma Ringshaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could
accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be
developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far
more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14629</th>
<th>Respondent: 10992225 / Emma Ringshaw</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.</td>
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<tr>
<td>There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m</td>
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<th>Comment ID: PSLPP16/14630</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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</table>
I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14636  Respondent: 10992225 / Emma Ringshaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): 

I OBJECT to this policy. It is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/14632  Respondent: 10992225 / Emma Ringshaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

<table>
<thead>
<tr>
<th>Our villages are already suffering from severe congestion for much of the day, for example the Newark Road &amp; Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.</th>
</tr>
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<tr>
<td>Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.</td>
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<tr>
<td>I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.</td>
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<tr>
<td>Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.</td>
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<tr>
<td>With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.</td>
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<tr>
<td>The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.</td>
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<tr>
<td>The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon, The Street only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements. I have personally witnessed HGVs mounting the pavements on many occasions because they are unable to pass oncoming traffic any other way on this narrow road. Only last week one HGV only narrowly missed one of our neighbours who was walking with her children on the way to school.</td>
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<tr>
<td>1. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)</td>
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<tr>
<td>Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.</td>
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<tr>
<td>Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents in the locality will see their quality of life significantly deteriorate in many ways.</td>
</tr>
<tr>
<td>Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.</td>
</tr>
<tr>
<td>Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.</td>
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<tr>
<td>Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.</td>
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<tr>
<td>There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?</td>
</tr>
</tbody>
</table>
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14633  Respondent: 10992225 / Emma Ringshaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14634  Respondent: 10992225 / Emma Ringshaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states: “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt). This yet another example of an ill thought out plan and approach. Once taken the Green Belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl with these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost - to the serious detriment of residents and visitors to the area - and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. This is nonsensical. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14622  Respondent: 10992225 / Emma Ringshaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact to existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles putting even greater pressure on the road infrastructure. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. Given the result of the EU Referendum this now needs to be reconsidered.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation of Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result will be a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.
12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.
13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.
14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.
15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4583  Respondent: 10992225 / Emma Ringshaw  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word "minimum" is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.
15. I object to the potential impact of para 4.4.23a on Burnt Common with its over allocation of industrial zoning is subterfuge for a waste management facility which is a dishonest and underhand approach to planning and proper consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Respondent: 10992225 / Emma Ringshaw</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”</td>
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<td>Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”</td>
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<td>The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.</td>
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<th>Respondent: 10992417 / Philip Erhardt</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Strategic Housing Assessment as being far too high and unbalanced across the borough.
I object to 700 new houses per annum in the borough as being too high (Appendix D).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/716  Respondent: 10992417 / Philip Erhardt  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land at Garlick’s Arch as it is Green Belt land (Policy P2)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1446  Respondent: 10992417 / Philip Erhardt  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of proper infrastructure (policy I 1). The sewerage system cannot cope, the schools are full and healthcare at breaking-point.
I object to the extra congestion that the development will cause to all local roads. The councillors should visit Ripley during morning rush-hour.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1445  Respondent: 10992417 / Philip Erhardt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the former Wisley Airfield.

I object to proposals to remove Ripley, Ockham, Clandon and Send from the Green Belt. There are no exceptional circumstances for removal.

I object to a plan which proposes that over 70% of new housing be built within the Green Belt.

I object to any reduction or tinkering with the Green Belt. There is enough brownfield land to use without encroachment on the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1447  Respondent: 10992417 / Philip Erhardt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to development in areas which are at risk of flooding (policy P4) The East Clandon Stream floods enough as it is without new development nearby.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/73  Respondent: 10992417 / Philip Erhardt  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the eight plots for travelling people. Why do 75% of these site have to be in Ripley.

I object to the inclusion of 6 Travelling People plots as it is entirely inappropriate within the Green Belt.

The Guildford Planning Committee seems to have its head in the sand. We do not need all these houses and definately do not have the roads and infrastructure to support them. This is evidently clear to everyone except your Committee. Why can’t you just accept the will of the people, or is there another reason why you keep on attacking our villages?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2742  Respondent: 10992417 / Philip Erhardt  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to continue to register my objections to the inclusion of Policy A35, Three Farms Meadows in the Draft Local Plan.

1. Congestion – road traffic. I object on the grounds that this development has serious issues involving congestion:
   - The site is adjacent to the most conjected road network in the country – Junction 10. The associated traffic of RHS events has not been taken into account.
   - The increased traffic on the route to Woking station has not been taken into account.

1. This conestion results in increased air pollution which has NOT been taken into account by the plan.
2. This site will be facing the Surrey Hills AONB and will increase the negative impact of the views.
3. There is not sufficient employment availible of site – nearly all residents will have to travel to work, resulting in increased conestion.
4. In Appendix H p. 16 the change in site boundaries are not correctly identified.
5. I object to the development on flood zone 2 and 3 – whilst the plan “limits” the development in these zones, development should be EXCLUDED from these zones – they FLOOD!!
6. I object to the 10% buffer in the housing number. This is not needed.
7. I object to the apparent disregard for the impact of high pollution levels and nitrogen deposition.
8. I object to the extension of the plan period by one year as it has not been identified as a major change.
9. I object to paragraph 22 as it does not reflect as this does not reflect the impact of the buildings on the surrounding area.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/646  Respondent: 10992417 / Philip Erhardt  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Increase in housing from 45 -60 at site A42 Tannery Lane will further impact on the road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/643  Respondent: 10992417 / Philip Erhardt  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am emailing to register my objections to the proposed new local Guildford Plan.

I object to the potential increase from 400 houses at site A43 Garlicks Arch. It is harmful to the rural nature of the surrounding villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/644  Respondent: 10992417 / Philip Erhardt  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A46
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<td>I object to the unbalanced distribution of development. The removal of site A46 from the plan has over-burdened the North-East of the Borough.</td>
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<td>The plan does not clearly outline the Waste Management Facility at site A58 Burnt Common.</td>
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<th>Respondent:</th>
<th>10992801 / Martine Szabo-toth</th>
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<td>The potential increase in industrial floor-space at site A58 Burnt Common and is ambiguous.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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I OBJECT to the fact that GBC have failed to provide sound evidence in terms of the Employment Land Needs Assessment which shows that industrial space at Burnt Common IS NO LONGER NEEDED.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7995  Respondent: 10992801 / Martine Szabo-toth  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43.30 the proposed development of Garlicks Arch designated for 400 houses and an industrial estate. This is a new site not included in the Regulation 18 draft and has NOT been consulted on previously. It is not only permanently protected green belt but also a site of ancient woodland with some trees planted in the 16th century.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7996  Respondent: 10992801 / Martine Szabo-toth  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to policy A43.30 the development of new four way interchange onto the A3 which would mean that narrow Send Road (A247) would be the main route for traffic leaving the M25 and A3. It is already crowded and vulnerable to traffic jams. Further traffic from this development would result in permanent gridlock. It simply would not work.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to policy A44 which would see 40 homes and two travellers' pitches on land west of Winds Ridge and Send Hill. This was again a NEW site NOT included in 18 draft and therefore has NOT been consulted on previously. Once again this is Green Belt land partly containing unsafe landfill. Access is by a narrow lane which could never take the volume of traffic that would ensue from traveller's pitches.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT to the fact that the Local Plan takes no account of schools, doctors surgeries and roads that are already operating at full capacity. Another 4000 houses in this area with a conservative estimate of a further 8000 cars would be catastrophic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the removal of 15 villages, including Ripley and Send, from the green belt. This will lead to wholesale, and often inappropriate developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/2030  Respondent: 10992801 / Martine Szabo-toth  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the fact that GBC have not followed the correct process for Send and Ripley developments. Any significant changes to the 2014 proposals, such as the proposal development of Garlicks Arch, should have required another full consultation, which did not happen. This invalidates the whole process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1632  Respondent: 10992801 / Martine Szabo-toth  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to object to the latest changes to the plan.

I object to Policy A43, Land at Garlick’s Arch Send Marsh, because it will cause overdevelopment to the local area and will generate a level of traffic which the village cannot cope with. The village already struggles to cope with existing traffic levels. The number of homes is excessive.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 Land at Burnt Common, London Road because there is no need to build industrial or warehouse developments in the green belt where other brown field sites are available in Guildford and Slyfield. The impact on roads in the immediate area will cause excessive traffic problems.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1722  Respondent: 10992833 / Amanda Verny White  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1728  Respondent: 10992833 / Amanda Verny White  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3361  Respondent: 10992833 / Amanda Verny White  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to
consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:
2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.
There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size. Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.
I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)
Furthermore, several electricity pylons run through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a).

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7397  Respondent: 10992833 / Amanda Verny White  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7434  Respondent: 10992833 / Amanda Verny White  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7439  Respondent: 10992833 / Amanda Verny White  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7381  Respondent: 10992833 / Amanda Verny White  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and
general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development. The parking in this area is limited and public transport poor.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable
forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7429  Respondent: 10992833 / Amanda Verny White  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7419  Respondent: 10992833 / Amanda Verny White  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students are accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7424  Respondent: 10992833 / Amanda Verny White  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7444  Respondent: 10992833 / Amanda Verny White  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”
The wording of the policy is far too wide and drives a coach and horses through all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/7403  **Respondent:** 10992833 / Amanda Verny White  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause...
greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

Roads through West Clandon are extremely busy at rush hour and peak commuter periods. The development will only result in additional traffic through these routes, posing serious threats to life and health of villagers using the pavements and paths in the village. Heavy vehicles frequently mount the curbs and pavements at speed in these areas. Traffic is so heavy Station users in Clandon can wait for more than 10 minutes to pull out in busy periods, causing massive congestion in the village.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.
The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

As a West Clandon resident I am extremely concerned that the removal of these sites will result in the merging of our Green Belt village with the developments on the outskirts of Guildford, making a complete mockery of the term Green Belt. Our village character will be lost for ever if this happens, so we must try above all else to retain our Green Belt, not build on it.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.
GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7376 Respondent: 10992833 / Amanda Verny White Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site. The site at Garlicks Arch also comprises much greenfield areas – their loss will contribute to the increased flood risk of other local areas, particularly Send Marsh, which has a history of flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7361 Respondent: 10992833 / Amanda Verny White Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

2073
The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: SQLP16/1116</th>
<th>Respondent: 10992833 / Amanda Verny White</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016</td>
<td>Question 1: The evidence base and submission documents</td>
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Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

**ANSWER**

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

2. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford’s circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated...
an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1131  Respondent: 10992833 / Amanda Verny White  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5916  Respondent: 10994817 / Alan Hill  Agent:
<table>
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<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A22</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>Policy A22 Keens Lane I object because of close proximity to Whitmoor Common SPA.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<td>Policy A25 Gosden Hill Farm I object because development far too large causing loss of ancient woodland and traffic chaos.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<td>Policy A26 Blackwell Farm I object because huge sprawl of houses will ruin the view from the Hogs Back, a famous view.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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Comment ID: PSLPS16/5918  Respondent: 10994817 / Alan Hill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A34

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A34: Broadford Business Park I object because this area is at high risk of flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5920  Respondent: 10994817 / Alan Hill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A35 former Wisley Airfield I object because huge loss of productive agricultural land, prospect of massive traffic problems, lack of public transport links, surrendering to [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature].

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/914  Respondent: 10995137 / Veriss Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
With reference to the Draft Local Plan published by Guildford Borough Council, I wish to OBJECT to the following proposals:

I Object to Send Village being removed from the Green Belt

The Green Belt was created to protect open spaces and prevent the indiscriminate growth of individual communities and loss of community identities. Politicians frequently promise to protect the Green Belt but this proposal is a clear breach of these hollow promises. There are no special circumstances that justify this breach of public faith in their representatives and officers.

I OBJECT to building 45 houses at Clockbarn Nursery.

Tannery Lane is a narrow and twisty lane unsuited to large volumes of traffic, and it's junction with Send Road is already hazardous for vehicles leaving the lane. Send Road is already subject to traffic problems at peak periods - an increase in traffic exiting Tannery Lane will add to these problems, especially in view of other proposals in the Draft Plan (see below).

I OBJECT to building 400 houses and 7000 sq. meters of industrial space at Garlick's Arch.

The industrial space is not needed, but if it were this is not a suitable location for it. There is an established industrial zone at Slyfield, and any additional requirements should be located there.

If 400 houses were built on this Green Belt land the character of the local community would be totally transformed. Existing roads would not be able to cope with the additional traffic - they are already severely congested at peak times - especially if the proposed sit at Gosden Hill Farm proceeds plus the proposed me A3 interchange at Burnt Common.

There are already difficulties in obtaining appointments at the local Medical Centre and the local primary and secondary schools are already over-subscribed.

I OBJECT to a new interchange with the A3 at Burnt Common.

Existing traffic volumes proposals for Garlick's Arch, Gosden Hill Fa Burph, together with numerous smaller developments in th immediate vicinity, and also the proposed development of Wisley Airfield would result in the quantity of traffic travelling along Send Road to/from Woking becoming intolerable. This would not only affect Send and Ripley, but also Old Woking and Kingfield.

I OBJECT to the development of 40 houses an 2 travellers pitches at Send Hill.

The only access to this site is a very narrow country lane, and is totally inadequate for the volume of traffic which would be generated by this proposal. There would be substantial impact on the residents of housing adjacent to Send Hill and the traffic problems referred to above would be added to by this proposal.

Please ensure that these objections are shown to the Planning Inspector who will be considering your draft Local Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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I object to the proposed development at Gosden Hill as 2000 additional homes will have a devastating affect on traffic flows in the area as well as removing significant Green Belt forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to the proposed development at Clockbarn Nursery in Tannery Lane as this is in a flood risk area and the access on narrow lanes cannot cope with any increase in traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to the Garlick’s Arch proposed development because of the impact on already overcrowded local roads and services. Also, there will be increased flood risk in Send Marsh due to increased water run off into local stream. My home is already in a flood risk area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the large number of additional homes, 693 per year for 15 years because the borough is already overcrowded with significant traffic congestion, air and noise pollution.

I object to any further development along the A3 corridor which is threatening an urban sprawl from the M25 to the Hogs Back with the villages being merged together.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/370  Respondent: 10995233 / Pam Harnor  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the erosion of Green Belt and in particular, villages being inset from the Green Belt, as this is an irreversible process affecting quality of life for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2164  Respondent: 10995233 / Pam Harnor  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the Policy A42 change at Clockbarn in Tannery Lane because:

- The increase to 60 homes in place of 45 homes is 33% more and too much
- It ignores all the hundreds of previous objections made by local people
- It will worsen access and traffic problems in Tannery Lane and at the A247 junction
- It will make erosion of the Green Belt in our village worse
- It will make surface water flooding, which is already bad, even worse
- It will impact open countryside views from the River Wey Navigation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43 change at Garlick’s Arch because:

- It ignores all the thousands of previous objections made by local people
- There is no proven demand for Travelling Showpeople plots in this location
- It is beautiful permanent Green Belt and no “exceptional circumstances” exist
- It will cause over-development of our village and the number of homes is excessive
- It is exquisite ancient woodland that existed at the time of Elizabeth I
- It will join up Ripley and Send and defeat the key purpose of Green Belt
- It is subject to frequent flooding and is currently a flood zone 2 allocation
- It is contaminated by lead shot accumulated over fifty years
- It will generate excessive traffic that will block up the local roads of Send and Ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 10995233 / Pam Harnor</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy A 58 at Burnt Common because:

- It was deleted from the 2014 draft because of all the objections made previously.
- The word "minimum" is a change from the previous "maximum" in the 2016 plan and since that time there has been a decline in demand for industrial land.
- There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a hugeover allocation of 10 hectares at Send in the Green Belt.
- The impact on small surrounding roads will create traffic gridlock.
- It will join up existing villages and defeat the purpose of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/655  Respondent: 10995233 / Pam Harnor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to inset Send Business Park from the Green Belt because:

It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation.

There is highly restricted vehicular access along Tannery Lane in both directions.

Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1134  Respondent: 10995297 / Peter Cormack  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I objected to the 2014 Draft Plan and frankly can see little difference in the current plan to which I again object.

I object most strongly to any building on the GREEN BELT.

I object to any villages that are currently in the GREEN BELT being removed from it, such as the Horsleys, Ripley, Send, Clandons. There can be no justification for it as there are plenty of BROWNFIELD sights still available to accommodate the suggested requirement for some 693 homes per year for the next 20 years.

I object to the possibility of Guildford being increased by some 25 per cent due to the foregoing predictions.

I object most vigorously to any Brownfield sights being used for further factories, offices, warehouses and shops that would not include very substantial affordable housing in their planning footprints.

I object very strongly to any change in current settlement areas.

I object strenuously to any diminution of the current GREENBELT (National Planning Policy Framework Para 79).

I object to any widening of the village boundaries to encroach upon the current Greenbelt.

I object to the scale of new building throughout the Guildford borough which can not be reasonably substantiated and appears completely unfounded and a figment of some distant planners imagination.

I object most strongly and specifically to the proposed building on Gosden Hill Farm which is in the GREENBELT and designed to keep West Clandon from being absorbed into the Guildford sprawl.

I object most vociferously to any development of Garlick’s Arch with a view to creating a spur off the A3 going Southbound or Northbound as the surrounding infrastructure would be totally unable to handle any increase in vehicular traffic. Our already overcrowded village roads would not be able to cope with any increased traffic and would cause a highly increased possibility of injury or death to the local population as sidewalks are virtually non existent or indeed too narrow to accommodate the current village populations.

I object most strongly to any change being made to Newlands Corner, an area of Outstanding Natural Beauty that is FREE to everybody to enjoy.

It is fact that Surrey County Council has no funds available to repair many of the roads in and around West Clandon - specifically the junction of the A247 and A246 at the South end of West Clandon, and it would appear the Highways Authority have no interest.

The GREENBELT is sacrosanct and must be fully and totally protected at all times for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp173/217  **Respondent:** 10995297 / Peter Cormack  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Horsley North

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )
Policies A37, 38, 40, 42, 44 & 45 – My Objections

Some 295 houses in various smaller developments in West Horsley, 100 in Send and 15 in Ripley. These will generate traffic on the A 247 to access the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Gosden Hill development of 1700 houses. Reference to a potential link road from the development to the A247. The clear implication is for an access from the development to the A247 with enormous traffic implications for the A247.

South bound off- and on- slip roads to service the development and replace the existing off- slip road to Burpham. The only North bound access to the A3 will be via the existing slip road off Clay Lane. (See later, Burnt Common).

A 4-entry form secondary school, a primary school, a retail centre and a park and ride for up to 700 cars.

When developed, the new employment site at the north side of Gosden Hill Farm (site allocation A25) will be treated as an Office and Research & Development Strategic Employment Site (7000sq.m). This could mean several hundred employees.

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Garlick’s Arch development of 400+ houses and facilities for travelling showmen (implies storage yards and long vehicles). This will generate traffic on the A247.

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed
as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.
25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2053  Respondent: 10995297 / Peter Cormack  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Burnt Common strategic industrial employment site for light industry, storage and distribution activities. It is to be designated an Industrial Strategic Employment Site which means that it is a preferred site for industrial development including waste management facilities. The site is 9ha which it is stated allows for considerable future expansion. This will generate large amounts of traffic including heavy vehicles on the A247.

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately
half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/621  Respondent: 10995297 / Peter Cormack  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Although much is made of the need for new infrastructure to support these developments and for this to be in place as needed, the Plan admits … “we forecast that there will also be an absolute increase in overall traffic volumes” and this is assuming all the infrastructure (listed in App. C to the Plan) is in place in a timely fashion. GBC has little or no control over the plans of Surrey County Council as the local highways authority and Highways England for trunk roads. Worryingly, the Plan now has less substantive information about improvements to the A3 South of the M25 from Highways England and it appears that their plans are not yet formed (Policy ID2). In the absence of such information, the infrastructure proposed is specific to each proposed development and does not address cumulative effects. What would be the case with regard to planning approval if SCC and /or HE do not provide timely infrastructure?

The Plan now calls for nearly all infrastructure to be funded by developers (see APP. C). We question how realistic it is to expect developers not only to pay for all the infrastructure but also to have it in place in a timely fashion. The Plan says that planning permission will be refused if timely provision of infrastructure cannot be secured. Such refusals will almost certainly be settled in the courts. Developers’ business models are based on building and selling houses to create the cash to provide infrastructure. People will be living on the sites well before infrastructure is complete. Will GBC prevent development of Gosden Hill until slip roads etc. are provided off and onto the A3? Again, the infrastructure is site specific and does not address cumulative effects.

If development were to be refused the land would still have been removed from the green belt and its future rendered uncertain.

Residents are being asked to accept very large amounts of development with little or no detail being provided on measures which would relieve existing congestion and limit future problems. The cumulative effects of the developments listed below are certain to have a devastating effect on the A247 through our village (and of course on Send) and it is hard to see...
how any of the infrastructure proposed in the Plan (App. C) will do anything to mitigate the effects of these developments on the A247 and hence our village.

Summary of the Impacts on the A247 – My Objections

All of these developments will draw additional traffic to the A247 through the village. It would be naïve to think that the employment sites and schools will serve only the developments themselves. Apart from the normal movements of residents to and from the new sites there will be considerable additional traffic on the A247 generated by:

- children from elsewhere being delivered to schools and collected
- the employees of the offices and industrial sites getting to work and returning home
- the vehicle movements generated by distribution and storage activities
- traffic from Wisley wishing to travel South and returning
- traffic from Gosden Hill wishing to travel South and returning
- traffic from Slyfield wishing to travel South and returning
- private and commercial traffic originating in the South and accessing Gosden Hill, Burnt Common or the A3 and returning (including traffic from Dunsfold)

The A247 although an A road:

- is less than 2 vehicle wide in places
- does not have continuous footpaths
- has several sharp bends
- has a hump-backed bridge with poor site lines
- has a very difficult junction to access the station
- is largely unlit
- has a primary school
- is already very congested at times

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/66  Respondent: 10995297 / Peter Cormack  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Non-plan Items– My Objections

Surrey County Council’s business plan for Newlands Corner (not referenced in the Local Plan) to attract 100,000 more visitors a year. A significant proportion of these can be expected to use the A247.

Waverly B. C. has approved the development of 1,800 homes at Dunsfold which has the potential to feed traffic trying to avoid Guildford, onto the A247 to access the A3 (not referenced in the Local Plan).

Cumulative impact of changes – My Objections

Changes to the Plan have done nothing to alleviate the problems (particularly of traffic and congestion) raised in residents’ previous responses. Indeed it is now clear that the problems will be made much worse. There do not appear to be any changes which would be of benefit to the Clandons and indeed the cumulative effect of what is in the Plan and some external factors not in the Plan will have a much worse impact on the A247 through West Clandon and Send than the 2016 draft. Note that the A247 is the only road over the Guildford to Waterloo railway, North of Guildford that doesn’t involve travelling through the town centre.

Duty to Cooperate – My Objections

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3730  Respondent: 10995585 / Patricia Swain  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Housing number of 693 is far too high. Building houses on this scale in the Borough will completely destroy its character. People want to live here because of its beauty. Guildford can continue to be a successful business centre without having to grow - or where will it end?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
As a resident of Normandy I am particularly concerned about this area. We chose to live here because it is a small village, as I am sure most of the other residents of the village did. The plan has Normandy as a huge development site which will double its size - how can that be right? And to include a secondary school in a village where the access is small country lanes? Although we have a station most people would travel by car due to the expense and unreliability of the trains, and the convenience of travelling door to door. Also there is very limited parking at the station, but even if people drove to it, that would still increase congestion in the roads. The roads to and from the village are already at more than peak capacity at peak times. School traffic would make it intolerable.

The land marked for development in Normandy is beautiful open countryside with ancient woodland, and is a haven for bats, foxes and dear. It should remain that way for future generations to enjoy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the Local Plan on the grounds of development of green belt land which should be preserved as an amenity not just for the present but for generations to come.

No consultation has been carried out directly with local residents and the impact on the area would be enormous, not to mention the detrimental effect on already clogged local roads.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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There should be NO BUILDING ON THE GREENBELT without local resident agreement. This greenbelt destruction is robbing the next generation of their heritage and driving up pollution and traffic. The purpose of green belt is to prevent urban sprawl. Why should land that has previously been designated greenbelt be allowed to have that status removed? If it was deemed that it should be greenbelt then, it is even more important now that it remains greenbelt as pressure from developers grows.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Respondent:</th>
<th>10996033 / David Bennett</th>
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We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5167  Respondent: 10996065 / William May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please catalogue my objection to devleoping this area of green belt, outstanding national beauty and area of great landscape value.

I feel that this would be a wholly inappropriate development within the green belt. Primarily because it would it be visable from and adjoin protected AONB and area of great landscape value. As soon as that happens the AONB is blighted. The character of the area, totally rural and picturesque, would be significantly harmed.

The local infrastructure could also not cope with it, despite the Highways Agencys plans to improve the A3 and A31 junction. There is so much traffic along that stretch of the A31 and A3 that when just one thing is altered tremendous tail backs are created. For example this week the Surrey Sports Park diverted traffic slightly, and the queue to get to the hospital, research park, A3 and Park Barn was queued back nearly into town. It also took half an hour to leave Park Barn. This side of Guildford is already unable to cope with the volume of cars on the roads and could not cope with any more.

I also object on the grounds how it will negatively affect the flora, fauna and habitat within the local woodland, common land and farmland. For example there are nesting Skylarks each year in the land proposed to be developed, as well as many other species of animals and flora.

There has also not been a significant study in to how this will affect the areas of Park Barn where there has already been some localised flooding over the years. Currently the fields act as a run off for the Hogs Back, and where these to be developed there is concern about the risk of flooding among residents.

The harm to the local area far outweighs any special circumstances that the local council may deem fit and I urge the planners to reject plans at this site, despite the five year plan for house building.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing with reference to the 2016 Draft version of the Local Plan. In particular I would like to object to the proposed expansion in the Horsley’s.

- Congestion – The A3 ad M25 are already at capacity at peak times. Any increase in housing will exacerbate the congestion in and around the Horsley’s.
- Local Facilities – the local facilities cannot take any additional capacity. There are limitations at the local primary and local senior schools. The Horsley doctor’s surgery already has a problems servicing the existing community. There is also already a major problem with parking, I don’t believe that there is any infrastructure plan to accommodate the increase in housing – how can that possibly work?
- Safety – the roads cannot accommodate an increase in traffic – there are already significant problems with pot holes and with narrow pavements it would be an issue with people’s safety. There are a huge number of cyclists passing through who are already at risk and any additional traffic will put them in even more danger.
- Roads – there is a significant issue with flooding in and around the area.
- Greenbelt – why do you have to build on greenbelt and why are you not finding a site where you could create a new town with all the amenities required?
- Out of character – the density of the proposed new developments means they are significantly out of character with the existing villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to provide you with my views on the draft local plan as part of the current consultation. A large number of elements of the plan are, as far as I can tell, inconsistent with a number of national level and local policies and I would like the Council to consider these as part of the further development of the plan.

Size and density of proposed developments

The 2011 census indicated that West Horsley comprised of 1111 households. The proposed development in the local plan table summary on page 125 includes 485 new households in West Horsley – a 44% increase. Within this, the northern end of West Horsley village has approximately 400 households and the local plan includes 445 new households – an increase of over 110%. The current housing density within West Horsley settlement boundaries is around 10 dwellings per hectare,
while the local plan assumes a housing density of 14-20 dwellings per hectare – up to a 100% increase in density. Needless to say, doubling the number of houses and doubling the density of housing would completely change the character and day-to-day life of this area of the village, permanently destroying the current community and way of life.

As such, the proposed development in the local plan is a proportionally very large increase in housing, and at a much higher density than the existing village. Both of these elements contradict the National Planning Policy Framework 2012 (NPPF) in many of its policies. One specific major example is policy 9 – villages and major previously developed sites – which states that development should be commensurate to the size, character and function of existing settlements.

I believe that the local plan therefore needs to see a very significant reduction in the number of proposed new houses in West Horsley and a significant reduction in the proposed housing density in order to be consistent with national guidelines.

I understand that the borough does need to increase housing stock and support this aim, as long as it is done in a way that is fair and appropriate to the local areas impacted; however this is not the case across the borough and certainly in West Horsley. It is very clear from the plan that the development level is not fair in the case of West Horsley – for example there are 5 development sites (A37 – A41) and 485 homes proposed for West Horsley as opposed to 1 site (A36) and 48 homes, on an existing built area, for East Horsley, which is a bigger and more dense village currently with 1,343 homes. The existing parish settlement boundaries clearly separate East and West Horsley and therefore the two should not be considered together, these boundaries are the basis for previous and existing development, infrastructure, etc and are demonstrated in the council tax levies which are separately administered for East Horsley and West Horsley. It is also not appropriate for the local plan to redefine settlement boundaries unilaterally to support proposed development.

The plan overall in section 2.3 provides figures showing an 18% increase in population is expected over 22 years across the borough, but East Horsley is expected to contribute a 3.5% increase in homes over 15 years while West Horsley is expected to contribute a 44% increase in homes over 15 years, and the northern portion of West Horsley a 110% increase in homes over 15 years: this huge disparity is clearly unreasonable, and unacceptable to residents and should be unacceptable to Council Representatives too.

Green belt re-designation

The local plan is built on the premise that the area to be developed in West Horsley will be removed from the green belt. However, the NPPF and related parliamentary directives state that re-designation of the green belt is only permissible in exceptional circumstances, and that meeting housing targets cannot be considered exceptional. Furthermore, West Horsley is an attractive village with much history and character – it is visited by many cyclists and walkers for this reason and this is a major reason for the decision of many residents to live in West Horsley – and therefore removing parts of West Horsley from the green belt is in contravention of the elements of the NPPF which specifically state that villages with character make an important contribution to the green belt. The plan itself, in section 4.3.12, acknowledges that villages with open character contribute to the green belt, and it could certainly be argued that West Horsley has an open character in this way, especially those sections of West Horsley that are marked for possible development. I do not believe that any part of West Horsley can justifiably be removed from the green belt for these reasons, and I do not believe that the local plan makes a supportable case for this re-designation.

Sustainable development

The NPPF states that development must be sustainable, and elements of the local plan do not seem consistent with this ethos. Specifically, the area of Policy A38 contains a number of elements that conflict with the message of sustainable development:

1. The site currently contains a growing and high quality nursery school which provides both employment for a large number (approx. 30) of primarily young women and also provides an essential service for village residents. Without this business, the character of West Horsley would change significantly, valuable jobs would be lost or removed from the village, and some residents would be forced to travel by car to other villages and/or move away from the village as a high quality nursery school is an essential part of their lives and the ability for both parents to work, which provides local and national tax income. I note that the plan includes a general statement that the nursery would be maintained, however it is not possible that the current character of the nursery – next to a farm and open space, which children crave – will survive amongst 135 homes of up to a high density. The plan
must ensure the nursery school is maintained, and further that it has room to grow to accommodate new residents (especially required under this plan), with safe access and maintenance of it’s countryside character

2. Policy A38 also contains good agricultural land and as such a principle of sustainable development would favour other sites such as brownfield sites in urban areas over this one

3. Policy A38 also contains a grade II listed farmhouse

Infilling

The five proposed development sites in West Horsley are generally of very large size when compared to the existing settlements, and are not consistent with national and local approaches of limited, sustainable infilling of settlements. In addition to the issue of size, the boundaries and shapes of the proposed sites A38 and A41 in particular can clearly not be described as infill, as in both cases parts of the proposed site are only bounded on two sides by existing parts of the village – the northern and north western portion of site A38 and nearly all of site A41. The Northern and north western portion of site A38 appears totally unsuitable for development based on infilling with high density housing, as in most places it is only bounded on one side by existing houses, which are of low or very low density, and if the farm house and nursery are preserved as stated, the whole northern end of this development area will be separate from the southern infilled end and should justify it’s own case for development – which it clearly cannot on the grounds of infilling.

SANG space

The local plan includes the re-designation of ‘Bens Wood’ in West Horsley to SANG space, and this availability of amenity space is an important part of the proposed developments in West Horsley – without sufficient amenity space the developments are not permissible. However, this re-designation of Bens Wood as SANG appears to be a unilateral statement which does not appear to be justified or appropriately approved, and requires a full assessment of current usage to assess spare capacity. As this area is also already well used as an amenity space and the spare capacity is not sufficient for the proposed development in the local plan (as the proposed development requires SANG space greater than the total size of Bens Wood even if it were totally unused), I believe that the local plan should not be agreed on the basis of Bens Wood being designated as SANG until a full assessment is carried out, and that the size of development area or number of proposed houses should not be agreed until the spare capacity has been established, and the proposed number of houses is appropriately reduced. A unilateral presumption that Bens Wood can be considered sufficient SANG for the scale of development in the local plan appears to be totally incorrect and will result in failure to secure sufficient SANG space for development later in the planning process.

The additionally identified SANG space in West Horsley (SANG8 in the appendices) is currently farmland which has recently been acquired, likely tactically by developers to support their plans. It would require redesignation from valuable agricultural use. The proximity of SANG8 to Area A38, which is extended way beyond an infill, as stated above, appears to possibly be a way to provide developers with sufficient housing space to develop to that they can fund the significant costs of a SANG development. This negative cycle of development requiring more and more room is greatly to the advantage of developer profits and greatly to the disadvantage of local residents, who see even more housing being developed just to provide funding for a SANG space to justify a base level of housing to be developed.

Facilities and Transportation

The scale of development proposed in West Horsley is enormous compared with the current scale of the village. This proposal would require a full study of many elements of facilities and transportation, and it is likely that many of these elements would cause significant challenges for development. These include, but are not limited to:

- Primary schooling – the Raleigh school has little room for expansion and is already oversubscribed. I believe that one of the development areas for housing proposed in the plan directly conflicts with a possible new site for the school which of course makes doing both impossible
- Secondary schooling – there are no secondary schools available in either West or East Horsley as it is, with long car journeys, buses, and capacity issues with the Howard of Effingham school, which itself is already over capacity and seeking a new home. Having so much housing in an area with no local secondary school does not seem sustainable
- Pedestrian facilities – in West Horsley, many roads do not have pavements or have small pavements, and most streets are not lit
• Roads and parking – traffic is already significant in the Horsley station area, roads are small and often not of good quality (for example, Long Reach); parking is an issue at Horsley station, Effingham Junction station (which would be totally overwhelmed by any development at Wisley Airfield) and the shops in both East Horsley and particularly West Horsley. Some high use roads such as East Lane and the Drift are inappropriate for additional traffic, with dangerous narrow sections which already cause blocks and accidents
• Transport – three of the four proposed development sites are not within walking distance of Horsley train station and no/few regular buses are available, meaning a sharp increase in road usage throughout the village from the proposed developments

Policy A38

This proposed development area provider for 135 homes in the North West Part of West Horsley, a huge increase compared to the current housing in the immediate area, which is approximately 130 homes between the relevant sections of Long reach, East lane, and Northcote Road. This huge increase in a small area with a close local community would entirely change the character of this area, especially with the density of housing which will need to be high to accommodate the number of homes. It will also cause problems for infrastructure, surface water flood risk, and green infrastructure. This development area is in addition to others sited very close such as A39, A40, and A41, which will compound these negative effects.

Conclusion

Many parts of the local plan for West Horsley appear to have significant, and in some cases, insurmountable, issues for the proposed development. In particular, West Horsley is a small village which would see massive expansion of a size and scale and density that is totally inconsistent with the existing settlement, and this expansion would also cause many issues with infrastructure and amenity space, much of which is already stretched. In short, the local plan does not appear to provide anywhere near the sufficient justification for removing parts of a village with significant character, in the case of West Horsley, from the green belt and for including developments which could be in part be challenged as to whether they are sustainable or consistent with national planning guidelines. West Horsley is a village with an open character, by which definition should be maintained in the green belt according to the local plan itself – however the proposed development sites in this plan will themselves destroy the open character of the village, in particular by more than doubling the housing in the northern end of West Horsley. It is entirely inappropriate and inconsistent with national guidelines for the plan to deliberately destroy the open character of a green belt village, as this proposed plan would.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Major transport issues are unresolved, the town is already congested.</td>
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<td>I oppose unjustified Green Belt development.</td>
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<td>It so unacceptable that Guildford is choosing not to constrain its overall housing growth.</td>
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**Comment ID:** PSLPA16/1671  **Respondent:** 10997121 / Rob Curling  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/1675  **Respondent:** 10997121 / Rob Curling  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant...
infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3219  Respondent: 10997121 / Rob Curling  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays

  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital  Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.
I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.
Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

**Comment ID:** PSLPS16/3214  **Respondent:** 10997121 / Rob Curling  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.
Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

- **Comment ID:** PSLPP16/7026  **Respondent:** 10997121 / Rob Curling  **Agent:**
- **Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/7063</th>
<th>Respondent: 10997121 / Rob Curling</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/7068</th>
<th>Respondent: 10997121 / Rob Curling</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7005  Respondent: 10997121 / Rob Curling  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<th>Comment ID: PSLPP16/7012</th>
<th>Respondent: 10997121 / Rob Curling</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/7018</th>
<th>Respondent: 10997121 / Rob Curling</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/7079 | Respondent: 10997121 / Rob Curling | Agent: |
I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.
I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/7054</th>
<th>Respondent: 10997121 / Rob Curling</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td>I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.</td>
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<td>In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.</td>
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<td>It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.</td>
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<td>In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.</td>
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<td>And at what point will ‘affordable homes’ be able to go onto the market at full market price?</td>
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<td>As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7074  Respondent: 10997121 / Rob Curling  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations were available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7032  Respondent: 10997121 / Rob Curling  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment
without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy 11. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy 11 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7039  Respondent: 10997121 / Rob Curling  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7043  Respondent: 10997121 / Rob Curling  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6994  Respondent: 10997121 / Rob Curling  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London.
cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7000  Respondent: 10997121 / Rob Curling  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood
risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/6983  **Respondent:** 10997121 / Rob Curling  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including...
Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6988  Respondent: 10997121 / Rob Curling  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared
with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in
the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID:</th>
<th>SQLP16/1070</th>
<th>Respondent:</th>
<th>10997121 / Rob Curling</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

2. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: SQLP16/1075  Respondent: 10997121 / Rob Curling  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1079  Respondent: 10997121 / Rob Curling  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. "Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt." Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation

2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation

3. GBC has proposed an OAN of 693 houses per annum in the GL Hearns West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound

4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018

5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars

6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham

7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework

8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1083  Respondent: 10997121 / Rob Curling  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.
I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3990  Respondent: 10997249 / John Flatman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objection to Guildford Borough Council draft Local Plan (June 2016) and to the inclusion in the Plan of Site Allocation A35 - the Former Wisley Airfield

I wish to OBJECT to the draft Guildford Borough Council Local Plan, specifically because of the retained inclusion in that draft of the site at Three Farms Meadows (Wisley Airfield).

Although as a resident of Cobham I do not live within the boundary of Guildford Borough Council, I, my family, neighbours and all residents of Cobham village would be severely adversely affected by any development on this site. I am aware that GBC have a statutory obligation to consult with neighbouring boroughs and take full note of objections.

Our objections are:

1. the Three Farms Meadows (Wisley Airfield) site is a high-grade agricultural site in the middle of Green Belt land. GBC have an obligation to preserve such sites to prevent encroachment and infilling of the Green Belt.
2. GBC's likely future housing needs can be met through development of many available brownfield sites in the borough, which are far better located for access to transport, shops, educational and medical facilities, etc.
3. Although outside the Borough boundary, Cobham is the nearest shopping and transport hub to any development at Wisley. Any such development would overwhelm already critically challenged facilities such as road and rail transport links, schools and doctors' surgeries. A development at Wisley would, for instance, generate further congestion on commuter trains running through Cobham and Stoke d'Abernon station, already with standing room only at rush hours. There is a desperate shortage of school places in the area, particularly secondary schooling.
4. Road traffic through Cobham would inevitably be increased. Already, traffic on the key A245 link from the A3 causes air pollution well in excess of statutory limits.

Any development in this location will severely damage the environment and quality of life of tens of thousands of local residents. The site should be removed from the GBC local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8207  Respondent: 10997281 / Judy Bridgeman  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- destroy views from the Hog’s Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/94  Respondent: 10997281 / Judy Bridgeman  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/957  Respondent: 10997377 / Sarah Singleton  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
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- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
As a resident of Shalford, and as family members of Shalford LTC, I am writing to strongly object to the current version of the local plan which removes the fields behind the Village Hall and Tennis Club from the Green Belt and puts them in the Shalford settlement boundary.

Although these fields have been classified as “open spaces” I am concerned that they do not have the same degree of protection as the Green Belt from housing development. Should houses be built on this site, the resulting traffic chaos would increase the already severe problems for Shalford, where roads are blocked every weekday from 7am – 9am as traffic tries to join the heavily congested A281 into Guildford and the surrounding towns. Vehicles from any housing built on these fields would have to join traffic on Chinthurst Lane, further causing pollution and increasing the risk of an accident as many young children and families walk along Chinthurst Lane to school.

Furthermore, I feel the small village of Shalford needs to be preserved as such; we do not have the amenities, facilities or space to accommodate more housing on green space. Any construction on these fields, which are 25ft above the village hall, would tower over the tennis courts and bowling green and totally destroy not only the green lung of our village, but also the visual appeal of the area.

I urge you to make a small adjustment of the village boundary, moving it back to the 2003 green belt boundary, thereby protecting these fields and ensuring they remain open spaces for future generations of our village to enjoy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3172  Respondent: 10997537 / Sarah Nelson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a new interchange with the A3 at burnt common. The traffic through send village is already at a high, contested level. This will add to increased traffic, gridlock, resulting in noise and pollution levels that are unacceptable. We live close to send road and my daughter has developed asthma. When a big vehicle goes past the vibrations make my bed shake, most worrying and unpleasant. In addition the holes developing in send road are larger than pot hole and have to be repeatedly filled. The Planned interchange will exasperate this!

From a very concerned local resident with a young child.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/6925  Respondent: 10997537 / Sarah Nelson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to send village being removed from the green belt, central government gave a clear promise to protect the green belt. I voted for this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2537  Respondent: 10998081 / David Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

APPENDIX C

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2706  Respondent: 10998081 / David Marshall  Agent:
I OBJECT to the proposed Infrastructure Schedule (Appendix C)
The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.
I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D).

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A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

The current SHMA inflates the proposed housing figure due to failure to correct for errors in the historical data for international migration flows, issues with the way it considers students and affordability and flaws in the method for estimating the number of homes needed to support job growth.

It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 – 2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.
The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5676  Respondent: 10998081 / David Marshall  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy A25 with proposals for Gosden Hill Farm.
The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:
2010 – 2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head -- 17 incidents
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- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon -- a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off--slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87--89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow,
winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.
The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid--locked every day.
Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.
There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.
Electricity supply is also inadequate and would require a big infrastructure development.
The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.
The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.
The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.
If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.
A new on--slip at Burpham would only be 1.8km from the on--slip at Burnt Common which is against Highway England’s requirement of 2km.
Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash--flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.
Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/5249  **Respondent:** 10998081 / David Marshall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.
I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)
Furthermore, several electricity pylons run through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/5677  Respondent: 10998081 / David Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council’s eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement-- often at speed. It has narrow bends with poor sight lines, an infants school and a hump--backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re--cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the
road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site.

Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4). This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)
I OBJECT to the local plan based on the impact it will have on the special countryside of the borough. The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11196  Respondent: 10998081 / David Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D3 -- Historic environment
I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11197  Respondent: 10998081 / David Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 2142 of 2167
I OBJECT to Policy D4 -- Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.
The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11174  Respondent: 10998081 / David Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)
I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.
The site is in any event subject to frequent flooding and unsuitable for development.
If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.
The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11176  Respondent: 10998081 / David Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to the location for new employment floorspace (Policy E2)
I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt. Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.
There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to the loss of rural employment (Policy E5)
Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy E6 - The leisure and visitor experience.
The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm. Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11194  Respondent: 10998081 / David Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre
The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy. There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes
could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/11190</th>
<th>Respondent: 10998081 / David Marshall</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4–5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London. Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40. In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses. It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand. In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income. And at what point will ‘affordable homes’ be able to go onto the market at full market price? As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions. The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87–89) fully applies, including the need to prove “exceptional circumstances.” The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments. The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations Ire
available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be "closely related" Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity — only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87–89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11187  Respondent: 10998081 / David Marshall  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2) I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/11188  Respondent: 10998081 / David Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)
Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11172  Respondent: 10998081 / David Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)
This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt
Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to
justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11173  Respondent: 10998081 / David Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)
National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding. The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 – having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11170  Respondent: 10998081 / David Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11171  Respondent: 10998081 / David Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These need to be revised downwards, possibly quite seriously. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is too small. Half of Guildford’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For example, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase
availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>SQLP16/1325</th>
<th>Respondent:</th>
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<td>Document:</td>
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I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.
1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/1328  **Respondent:** 10998081 / David Marshall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/1331  **Respondent:** 10998081 / David Marshall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford’s circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and...
foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp173/657</th>
<th>Respondent: 10998273 / Andy Lock</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is my assessment that the submission plan is unsound due to the number of errors in the plan, the poor quality and lack of transparency in the evidence base, the accessibility of the evidence base, including the fact that huge files have again been used and these are not accessible to those with poor internet connections. There is also considerable lack of clarity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of additional 3.1 ha from the green belt without any justification

I object to the change in green belt boundary

I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3

I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the housing number for the local plan particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the extension of the plan period by 1 year as it has not been identified as a major chang

I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**Comment ID:** PSLPA16/2151  **Respondent:** 10998721 / C E Noble  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** (Yes)

I am not happy with the proposed number of new housing units to be built in Guildford, as I do not understand how these figures were calculated. Given the inevitable slowing of the economy due to Brexit, these numbers will also be in need of downgrading. So-called affordable housing is very unaffordable for people trying to get on the housing ladder, any claims that such accommodation is truly affordable are suspect. In fact, should the government not be encouraging growth in the other regions and discouraging it here?

Infrastructure has not been addressed adequately. It should be in place first, and not treated as an afterthought. What about the added in-town congestion that the addition of 13000 new dwellings will bring to an already highly congested town centre? From every viewpoint, this plan is flawed and built on absurd assumptions, besides being incomplete in its scope.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/2150  **Respondent:** 10998721 / C E Noble  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

6. I object to the fact that no adequate consideration has been given to the provision of infrastructure such as Doctor's Surgeries, Schools and other facilities. There are no proposals for such things to be provided at the same time as the proposed developments. How are these to be serviced? The proposals are wholly inadequate in this respect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I object to the fact that in the first instance no evidence has been given to substantiate the alleged need for new housing units, i.e. this level of development is not necessarily needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9099  Respondent: 10998721 / C E Noble  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (

1. I object to any erosion or diminution of the Green Belt to facilitate further development is totally unjustified. The Green Belt was originally to prevent urban sprawl and to maintain our countryside and rural areas; these proposals are a radical departure from this long-held principle. The notion that entire villages, such as Wisley and Ripley, can simply be removed from the Green Belt and lose the protection that this status offers is mind-boggling.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9102  Respondent: 10998721 / C E Noble  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (

I object to any erosion or diminution of the Green Belt to facilitate further development is totally unjustified. The Green Belt was originally to prevent urban sprawl and to maintain our countryside and rural areas; these proposals are a radical departure from this long-held principle. The notion that entire villages, such as Wisley and Ripley, can simply be removed from the Green Belt and lose the protection that this status offers is mind-boggling.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9151  Respondent: 10998721 / C E Noble  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
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<tr>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7. I object to the level of proposed development in individual areas as disproportionate. The proposals as currently drafted would result in the character of whole areas being irredeemably changed and are wholly inappropriate in areas predominantly rural in character. These proposals would result in mas suburbanisation and a further large scale reduction in England's "green and pleasant land".

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. I object to the six week consultation period which is totally and utterly inadequate for proposals of this nature and magnitude. It does not give parties affected adequate time to prepare their case and/or to take professional advice. Perhaps this is the intention.

3. I object to the 2 week notice of some of the included sites. Such a period, coupled with a ridiculously inadequate consultation period for such major planning proposals that would radically alter the character of the whole area is nothing short of ridiculous.

4. I object to the document itself, which is far from user friendly. It is excess of 1800 pages in length and gives every impression of being "cobbled together" as a matter of urgency without anything like the amount of consideration that such major proposals need. It gives every impression of having been prepared with the intention of confusing rather than informing affected parties.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the fact that the majority of these points were brought up in my previous objection the Local Plan sites 67/74/75/76 and 99/ Send/Sendmarsh. No satisfactory answers have been given to these points in your new plan, and it would appear that they have been conveniently "swept under the table" leaving large unanswered objections to the people in the areas concerned. If your Council is expecting support from the local residents in the area you need to produce a professional plan taking their concerns into consideration and giving satisfactory answers to their objections, so far this has not been done.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7996  Respondent: 10998817 / Janet Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Send losing its Green Belt status

The Green Belt should remain intact throughout the borough. Its purpose was to ensure villages/towns don’t merge and become large conurbations, to protect the countryside, to encourage the use of derelict and other urban land, to preserve the special character of old towns and villages. All these issues are still relevant, perhaps even more so.

With more and more development, housing and industry in the South East we are seeing huge increases in road and air travel. Consequently, the air quality in the South East is under threat. London itself, has some of the worst air pollution of all European cities. If we increase development and at the same time lose the Green Belt we reduce the means to help improve or maintain air quality at an acceptable level. It is the vegetation in the Green Belt that is responsible for absorbing the additional carbon being produced by our increased travel and industrial use.

The air quality along Send Road is already unacceptable. I lived on Send Road for 20 years and my neighbour’s child suffered so badly with asthma that they were forced to move to another area of Send, away from the main road. This may be anecdotal evidence but I wonder if it would be possible to do some monitoring of air quality along these busy roads before we plan to increase the weight of traffic yet again.

Green Belt was meant to be permanent unless it could be shown that exceptional circumstances existed to allow it to be developed. Surely these ‘exceptional circumstances’ need to be considered on an individual basis rather than just wholesale removal of all land in the village from the Green Belt.

The National Planning Policy Framework (NPPF) states that ‘unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the ‘very special circumstances’ justifying inappropriate development on a site within the Green Belt’. (NPPF 3-034-20140306).

Surely those responsible for planning should consider the bigger picture. The number of new houses and other developments listed in the Local Plan is significantly above the actual need and will cause enormous pressure on the existing infrastructure especially the increases traffic on our already unacceptably busy roads and motorways. Global warming is not an idle threat and the UK should be responsible with its plans for development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Fifth, the Garlic Arch development, right on our doorstep, would ruin the area we chose to live, cause health hazards from air pollution and is just not necessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/14031  Respondent: 10998913 / Brian & Amanda Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Thirdly, I object to development due to traffic congestion. As it is, we cannot get to a station during rush-hours because of congestion. The A3 is regularly backed up, in both directions, making travelling anywhere an increasing frustration.

Fourthly, I object to the strain on local services. We are unable to get an appointment within a reasonable amount of time for a doctor. Schools are already under strain, police services are already dangerously low and there seems no further money to accommodate this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Firstly, to remove Send, Ripley, Send Marsh, the Horseys and Effingham from Green Belt would have a huge effect on the green and pleasant area in which we live. This sweeping change to our existing rights and well-being is unacceptable.

Secondly, I object to the sheer number and volume of houses and industrial units proposed for the area. The area just cannot support this amount of development. Nor can it accommodate four traveller pitches.

Whilst some new homes may be necessary, your proposals are unacceptable in the sheer volume, with the additional concern of removal of Green Belt protection.

I urge you to listen to residents whose lives will be so affected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Re: I object to the 2016 draft local plan for proposed building on Green Belt land in Send, Send Marsh and Ripley.

My mother, with whom I live, and my late father moved to Send Marsh in 1965 when I was two years old, indeed, walking up Greyfriars Road holding my mother’s hand towards our new home is my earliest memory. Along with my two elder sisters and my younger sister, born in The Sheiling in 1966, we have enjoyed and truly been blessed with our parents’ forethought and aspiration of bringing up their four daughters in a rural, Green Belted community.

My sisters and I went to schools in Send, sang in the choir in Send Church, and went to Brownies and Guides in Send, Adventure Scouts in Ripley and attended many other activities in our local community. We are of course full grown now; however, The Sheiling in Send Marsh is still our family home and we care deeply, not only about our mother’s immediate environment, but for the local community too. The proposed building plans are simply unsustainable on many levels, eg:

- Lack of transport/road infrastructure - hugely increased traffic on already creaking roads
- Lack of amenities, eg, doctors’ surgery places, dental practices, hospitals, etc
- Lack of sufficient schools/nursery facilities to accommodate such a rise in populace
- Increased suburban noise levels (the A3 is already a constant drone 24 hours a day)
- The rise in populace will inevitably dilute the community spirit of the area

My mother, and subsequently I, has chosen specifically to live in a Green Belted, rural community. These proposed plans are not only unsustainable logistically and environmentally – they are in fact a gross infringement of the local community’s rights and freedoms.

I appreciate that we are living in a country whose population is ever increasing; however, Surrey is the most densely populated county outside of Greater London, so surely a better holistic view of the country’s needs should be to be taken into account before destroying Send Marsh, Send and Ripley’s beautiful Green Belted community.

For all of the above reasons my specific objections are as follows:

- I object to Send, Send Marsh and Ripley Villages being removed from the Green Belt
- I object to building 400 houses and 7000 square metres of industrial space at Garlick’s Arch
  This site is covered by ancient woodland and the industrial space is not required and could be built at Slyfield. Guildford’s housing requirements have been shown to be grossly exaggerated and they have refused to disclose their calculations. With proper use of brownfield sites this Green Belt site is not required.
- I object to building 45 houses at Clockbarn Nursery – particularly as permission has already been given for 64 apartments at The Tannery and for building a marina – all of which is unsustainable currently, let alone if more houses are built in the area
- I object to the development of 40 houses and two travellers’ sites at Send Hill
- I object to a new interchange with the A3 at Burnt Common
- I object to site A45 The Talbot
- I object to site A25 Gosden Hill Farm
- I object to site A35 Wisley Airfield
- I object to site A57 The Paddocks
- I object to the disproportionate amount of development in one area of the Borough
- I object to the lack of any evidence for the alleged housing need numbers

I request that my comments are shown to the Planning Inspector, and further request confirmation that you have received this communication. I look forward to hearing from you.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
I object to building of houses and industrial space at Garlick’s Arch. The site includes ancient woodland and is subject to flooding.

I object to the development at Send Hill. The road access is insufficient. The site contains unsafe landfill waste.

I object to any proposal that increases traffic along Send Road. This road is already under severe pressure during ‘rush hour’.

Please pass my comments to the Planning Inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Total records: 3565.